

Exhibit V

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

CASE NO. 24-81143-CIV-DMM

777 PARTNERS LLC and SUTTONPARK
CAPITAL LLC,

Plaintiff,

vs.

LEADENHALL CAPITAL PARTNERS LLP,
LEADENHALL LIFE INSURANCE LINKED
INVESTMENTS FUND PLC, NOAH DAVIS,
SAIPH CONSULTING LLC, and PAUL KOSINSKI,

Defendant.

/

VIDEOTAPED DEPOSITION OF ALEXANDER ADNANI

TAKEN ON BEHALF OF THE DEFENDANT

MARCH 24, 2025
9:00 A.M. TO 12:30 P.M.

KING & SPALDING LLP
200 SOUTH BISCAYNE BOULEVARD, SUITE 4700
MIAMI, FLORIDA 33131

REPORTED BY:
MICHELLE VILLALOBOS, COURT REPORTER, CER, CDR
NOTARY PUBLIC, STATE OF FLORIDA

	Page 2	Page 4
01	APPEARANCES OF COUNSEL	01 INDEX OF EXAMINATION
02	ON BEHALF OF THE PLAINTIFF:	02 WITNESS: ALEXANDER ADNANI
03	JAMES "JIM" BOLAND, ESQUIRE	PAGE
	SMITH GAMBRELL RUSSELL	
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06	ON BEHALF OF THE DEFENDANT, LEADENHALL CAPITAL PARTNERS	04 DIRECT EXAMINATION
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	Page 3	Page 5
01	APPEARANCES OF COUNSEL	01 INDEX OF EXHIBITS
02	ON BEHALF OF THE DEFENDANT:	02 EXHIBIT DESCRIPTION PAGE
03	FRANCIS D. MURRAY, ESQUIRE	03
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Page 6	Page 8
01 VIDEOTAPED DEPOSITION OF ALEXANDER ADNANI 02 MARCH 24, 2025 03 THE COURT REPORTER: We're now on the video 04 record. Today's date is Monday, March 24th, 2025, 05 and the time is 09:16 A.M. 06 This is the video deposition of Alexander 07 Adnani, taken in the matter of 777 Partners, LLC 08 and SuttonPark Capital LLC vs. Leadenhall Capital 09 Partners, LLP et al. This deposition is being 10 conducted at 200 South Biscayne Boulevard, Miami, 11 Florida. 12 The Court Reporter is Michelle Villalobos and 13 the Videographer is Ashley Taylor. 14 Would Counsel, please announce their 15 appearances for the record? 16 MR. DONOVAN: Sure. Brian Donovan from King 17 and Spalding on behalf of the Leadenhall, 18 Defendants. 19 MR. BOLAND: Jim Boland from Smith Gambrell 20 Russell on behalf of the Plaintiffs. 21 MR. FEUER: Good Morning, Leonard Feuer, 22 Leonard Feuer, P.A. on behalf of Noah Davis. 23 MR. MORLAN: Harold E. Morlan III on behalf of 24 Shutts and Bowen, I mean with Shutts and Bowen on 25 behalf of Paul Kosinski and Saiph Consulting, LLC.	01 Fifth Amendment right to against self-incrimination and 02 respectfully decline to answer your question. 03 Q. Sure. And so, for any Fifth Amendment -- 04 A. Yeah. 05 Q. Indications if you want to, you can say 06 anything so long as it references five, you can say the 07 whole thing if you want to, but if you just say Fifth 08 Amendment or take five or something like that, that's 09 fine. If you're amenable to that -- 10 A. Whatever -- 11 Q. I invoke the fifth -- 12 A. Invoke. 13 Q. I take the fifth, whatever you want to say, if 14 it says -- 15 A. Okay. 16 Q. If it uses the word five or fifth. How did 17 you prepare for this deposition? 18 A. Can you repeat the question? 19 Q. Sure. How did you prepare for this 20 deposition? 21 A. Just having conversations with my Counsel. 22 Q. How many conversations with Counsel did you 23 have? 24 A. I think just one. 25 Q. And which Counsel are you referring to?
Page 7	Page 9
01 MR. MURRAY: Francis Murray from Stumphauzer 02 Kolaya Nadler and Sloman on behalf of Mr. Adnani. 03 Thereupon: 04 ALEXANDER ADNANI, 05 was called as a witness, and after having 06 been first duly sworn, testified as follows: 07 DIRECT EXAMINATION 08 BY MR. DONOVAN: 09 Q. Okay. Mr. Adnani, how's it going today? 10 A. Good, how are you? 11 Q. Good. Can you state your full name for the 12 record? 13 A. Alexander Adnani. 14 Q. Can you give me your, your home address? 15 A. Yes. 488 Northeast 18th Street, Miami, 16 Florida 33132. 17 Q. Can you give me your work address? 18 A. Currently I am remote at this point. 19 Q. Have you ever been deposed before? 20 A. No. 21 Q. Have you ever given any type of testimony 22 before either oral or written? 23 A. Yes. 24 Q. What type of testimony are you referring to? 25 A. Under the advice of Counsel in invoking my	01 A. The Counsel that's here today, Francis Murray. 02 Q. All right. Did you have any conversations 03 with Counsel for -- strike that. Do you know who the 04 Plaintiff's are in this case? 05 A. Yes. 06 Q. All right. I'll represent to you that they're 07 777 Partners and SuttonPark Capital. Is that fair? 08 A. Yes. 09 Q. Did you have any conversations to prepare for 10 today's deposition with Counsel for the Plaintiff's? 11 A. No. 12 Q. Did you have any conversations to prepare for 13 today's deposition with any Counsel other than Counsel 14 who's in the room with you right now? 15 A. No. 16 Q. Did you review any documents to prepare for 17 today's deposition? 18 A. No, I don't believe so. 19 Q. What's your job title currently? 20 A. Going to invoke fifth. 21 Q. Are you employed by 777 Partners currently? 22 A. Yes. 23 Q. Are you employed by SuttonPark Capital 24 currently? 25 A. My employer is 777.

	Page 10		Page 12
01	Q. Is there any difference between 777 Partners	01	privilege instruction?
02	and SuttonPark Capital?	02	MR. MURRAY: That was a privilege instruction,
03	MR. BOLAND: Object to the form.	03	yeah.
04	A. What did you say, sir?	04	BY MR. DONOVAN:
05	BY MR. DONOVAN:	05	Q. All right. Let me just ask it again to make
06	Q. Sorry. He said, so he objected to the form.	06	sure that the objection, I understand the objection from
07	And so, I'll do it. He objected to the form,	07	your Counsel and your answer.
08	which is going to happen sometimes.	08	Outside of any communications you've had with
09	A. Okay.	09	Counsel concerning any of the lawsuits involving
10	Q. So, I'll ask the question, your Counsel or	10	Leadenhall and 777 Partners.
11	Counsel on the Zoom may object to form and then you --	11	What's your understanding of the New York
12	you'd still have to answer the question unless you're	12	lawsuit between 777 Partners in Leadenhall?
13	instructed not to by your Counsel, basically --	13	A. I invoke the fifth.
14	A. Understood.	14	Q. Do you understand that you're here testifying
15	Q. So, I'll ask my question again. Give me a	15	about the Florida lawsuit between Leadenhall on the one
16	second because I think Counsel on the Zoom or -- Counsel	16	hand and other Defendant's and on the other hand 777
17	on the Zoom is going to object to form?	17	Partners in SuttonPark?
18	A. Okay.	18	A. Yes.
19	Q. Are 777 Partners in SuttonPark Capital the	19	Q. What's your understanding of this Florida
20	same thing?	20	lawsuit?
21	MR. BOLAND: Object to the form.	21	MR. MURRAY: Same instruction as before
22	A. I invoke the fifth.	22	regarding privilege. If you have an independent
23	BY MR. DONOVAN:	23	understanding of the lawsuit, you can go ahead and
24	Q. Let me try it again. Are 777 Partners in	24	answer it, but if you do not then or invoking
25	SuttonPark Capital the same entity?	25	privilege or instruction not to answer.
	Page 11		Page 13
01	MR. BOLAND: Same objection.	01	A. Okay. I don't believe that I have an -- a
02	A. I invoke the fifth.	02	complete understanding of the lawsuit between or that
03	BY MR. DONOVAN:	03	we're discussing today.
04	Q. Can you describe for me your job	04	BY MR. DONOVAN:
05	responsibilities currently?	05	Q. Understood that you don't have a complete
06	A. I invoke the fifth.	06	understanding of the Florida lawsuit between 777
07	Q. Do you understand that there are lawsuits in	07	Partners on the one hand and Leadenhall and other
08	both New York and Florida between 777 Partners on the	08	Defendant's on the other hand.
09	one hand and Leadenhall on the other hand?	09	Do you have any understanding of the lawsuit
10	A. Have you rephrase that? I apologize --	10	that you're here testifying about today?
11	Q. Sure. Do you -- I'm just asking you yes or no	11	A. To be honest not entirely.
12	really. Do you understand that there are lawsuits	12	Q. Sure. I'm just, I understand that you don't
13	pending in both New York and Florida between 777	13	have a complete understanding or an entire
14	Partners and affiliates on the one hand and Leadenhall	14	understanding. I'm just asking do you know anything
15	on the other hand?	15	about why you're here testifying today?
16	A. Yes.	16	A. Yes.
17	Q. What's your understanding of the New York	17	Q. What's your understanding of what this case is
18	lawsuit between 777 Partners and affiliates and	18	about?
19	Leadenhall?	19	A. Noah Davis and Saiph Consulting, is it, and
20	MR. MURRAY: Mr. Adnani, if you have an	20	777.
21	independent understanding of that outside of	21	Q. Can you say more there?
22	conversations with Counsel, you should go ahead and	22	A. I don't know that I really have more
23	answer it. If you do not, you should not answer.	23	information than that.
24	A. Okay. I'm invoking the fifth.	24	Q. Well, what's your understanding of what Noah
25	MR. DONOVAN: Sorry, was that a -- was that a	25	Davis and Saiph allegedly did that gave rise to this

<p>01 lawsuit?</p> <p>02 MR. MURRAY: Same instructions as before. If 03 you have an independent basis outside of our 04 conversations, you can go ahead and answer on that 05 basis, otherwise I'm instructing you not to answer 06 based on privilege.</p> <p>07 A. Okay. What I heard is some equipment was 08 stolen from an office of SuttonPark, but I don't have 09 any other understanding.</p> <p>10 BY MR. DONOVAN:</p> <p>11 Q. Who did you hear stole equipment from an 12 office of SuttonPark?</p> <p>13 A. Noah, I believe.</p> <p>14 Q. Noah Davis --</p> <p>15 A. This is --</p> <p>16 Q. -- Sorry, go ahead?</p> <p>17 A. -- strictly, I believe an article that I saw, 18 so I don't have any further information regarding the 19 issue.</p> <p>20 Q. I see. So, is it fair to say that your basis 21 for understanding that this lawsuit is about Noah Davis 22 taking equipment allegedly from a SuttonPark office 23 building is news articles?</p> <p>24 A. Could you re-say that?</p> <p>25 Q. Sure. So, let me ask you like this. What's</p>	<p>Page 14</p> <p>01 A. Yes.</p> <p>02 Q. Do you know until when approximately?</p> <p>03 A. I don't recall an exact date.</p> <p>04 Q. How much interaction did you have with Paul 05 Kosinski while he was SuttonPark Capital's CEO?</p> <p>06 A. I'm going to invoke the fifth.</p> <p>07 Q. Did he have any interactions with Paul 08 Kosinski while he worked at SuttonPark Capital?</p> <p>09 A. I'm going to invoke the fifth.</p> <p>10 Q. Do you know who Noah Davis is?</p> <p>11 A. He was CTO of 777.</p> <p>12 Q. Okay. So, Noah -- is your testimony that Noah 13 Davis was formerly Chief Technology Officer of 777 14 Partners?</p> <p>15 A. To the best of my knowledge.</p> <p>16 MR. BOLAND: Objection.</p> <p>17 THE COURT REPORTER: I didn't hear.</p> <p>18 MR. DONOVAN: Mr. Boland, you might have to 19 speak up a little bit so we can, sorry, Mr. Boland, 20 you might have to talk, speak up a little bit so 21 that we can hear you when you object.</p> <p>22 MR. BOLAND: I will, I'm conscious of not 23 trying to interrupt, so I'll try to speak up a 24 little bit more.</p> <p>25 THE COURT REPORTER: Was that an objection he</p>
<p>01 your basis for your understanding that this lawsuit is 02 about Noah Davis taking equipment allegedly from 03 SuttonPark Capital's offices?</p> <p>04 A. I read a news article.</p> <p>05 Q. All right. Did -- is that your only basis?</p> <p>06 A. Yes.</p> <p>07 Q. Okay. What is Saiph?</p> <p>08 A. I believe it's consulting company started by 09 Paul Kosinski.</p> <p>10 Q. And who is Paul Kosinski?</p> <p>11 A. He was formerly working for SuttonPark Capital 12 as CEO.</p> <p>13 Q. Do you know what type of consulting services 14 Saiph provides?</p> <p>15 A. No. Financial Service.</p> <p>16 Q. Your testimony is that Saiph provides 17 financial consulting services?</p> <p>18 A. I don't know the extent of the services.</p> <p>19 Q. Do you know -- well, I'm just trying to ask a 20 general question about what your understanding is, if 21 any of what Saiph does?</p> <p>22 A. I believe that they provide financial 23 specialty services would be my best interpretation.</p> <p>24 Q. Did you say that your understanding was that 25 Paul Kosinski was formerly CEO of SuttonPark Capital?</p>	<p>Page 15</p> <p>01 used?</p> <p>02 MR. DONOVAN: He -- I think he objected to 03 form. I don't remember the question. Do you mind 04 reading the question back?</p> <p>05 THE COURT REPORTER: One second.</p> <p>06 MR. DONOVAN: I think, actually I think I 07 remember the question. Why don't we -- why don't I 08 try it again and then just if you don't mind giving 09 Counsel a chance to object and then answer.</p> <p>10 THE COURT REPORTER: I can play it.</p> <p>11 MR. DONOVAN: I got -- no, I got it.</p> <p>12 BY MR. DONOVAN:</p> <p>13 Q. Is it your testimony that Noah Davis was 14 previously Chief Technology Officer of 777 Partners</p> <p>15 MR. BOLAND: And I objected to the form.</p> <p>16 A. That was my understanding.</p> <p>17 BY MR. DONOVAN:</p> <p>18 Q. Do you know what his responsibilities were as 19 Chief Technology Officer of 777 Partners?</p> <p>20 A. I don't believe I would be able to answer that 21 question without having more information.</p> <p>22 Q. All right. Well, what's your understanding of 23 the responsibilities of a Chief Technology Officer at a 24 company like 777 Partners?</p> <p>25 MR. BOLAND: Object to the form.</p>

<p style="text-align: right;">Page 18</p> <p>01 A. I don't know that I would have all the 02 information to answer that question. 03 BY MR. DONOVAN: 04 Q. All right. Fair. Did you interact with Noah 05 Davis at all while he was Chief Technology Officer at 06 777 Partners? 07 A. Friendly interaction. 08 Q. Can you describe Noah Davis' personality? 09 A. He seemed very nice. 10 Q. Did he seem happy at his job? 11 MR. BOLAND: Object to the form. 12 A. I'm not sure I can answer that question. 13 BY MR. DONOVAN: 14 Q. I'm just asking based on your understanding or 15 what you saw, did Noah Davis seem happy on a day-to-day 16 basis? 17 MR. BOLAND: Object to the form. 18 A. I can't speak to his emotions. 19 BY MR. DONOVAN: 20 Q. Do you know when he -- do you know when he 21 resigned -- strike that. Do you know whether Noah Davis 22 resigned his position as Chief Technology Officer of 777 23 Partners? 24 A. I don't know. 25 Q. So, do you know whether Noah Davis is still</p>	<p style="text-align: right;">Page 20</p> <p>01 audit performed by Saiph on behalf of Leadenhall 02 beginning around late 2023? 03 A. I'll invoke the fifth. 04 Q. Do you know who Craig Gillespi is? 05 A. He -- I don't know his official title, but he 06 worked at Leadenhall. 07 Q. Is he the individual you interacted with at 08 Leadenhall the most concerning the credit facility 09 between 777 Partners in Leadenhall? 10 MR. BOLAND: Object to the form. 11 A. I'm invoking the fifth. 12 BY MR. DONOVAN: 13 Q. Do you know why Leadenhall wanted to conduct 14 an audit of or review its collateral starting around 15 2022? 16 MR. BOLAND: Object to the form. 17 A. I'm invoking the fifth. 18 BY MR. DONOVAN: 19 Q. Do you know whether Leadenhall engaged Saiph 20 to conduct an audit of its collateral? 21 A. I'm invoking the fifth. 22 Q. Can you tell me anything about collateral 23 audit conducted by Saiph on behalf of Leadenhall? 24 MR. BOLAND: Object to the form. 25 A. I'm invoking the fifth.</p>
<p style="text-align: right;">Page 19</p> <p>01 employed by 777 Partners? 02 MR. BOLAND: Object to the form. 03 A. I don't believe he is. 04 BY MR. DONOVAN: 05 Q. So, do you know when Noah Davis stopped being 06 employed by 777 Partners approximately? 07 A. That is unclear to me. 08 Q. Fair. Do you have any understanding 09 whatsoever, as to when Noah Davis left 777 Partners? 10 A. I don't think I would be able to answer it. 11 Q. Are you not able to answer because you don't 12 know or because you would prefer not to answer? 13 A. Because I don't know. 14 Q. Okay. Do you know why Noah Davis left his 15 position as Chief Technology Officer of 777 Partners? 16 A. No. 17 Q. Do you know whether Noah Davis ever worked as 18 an independent contractor for Saiph? 19 A. I don't know. 20 Q. What's your understanding of the term 21 collateral? 22 A. I'll invoke fifth there. 23 Q. All right. So, when I use the term 24 collateral, I'm referring to assets securing a loan. 25 Do you have any understanding of a collateral</p>	<p style="text-align: right;">Page 21</p> <p>01 BY MR. DONOVAN: 02 Q. Do you know whether 777 Partners objected to 03 Leadenhall performing an audit of its collateral? 04 MR. BOLAND: Object to the form. 05 A. I'm invoking fifth. 06 BY MR. DONOVAN: 07 Q. When I use the term A-CAP, I'm referring to an 08 insurance holding company called Advantage Capital 09 Holdings LLC. Do you understand that? 10 A. Yes. 11 Q. What is A-CAP? 12 A. I'm sorry, what is A-CAP? 13 Q. Yeah, let me try it again. Is A-CAP a lender 14 to 777 Partners? 15 A. I am invoking fifth. 16 Q. Did A-CAP object to Leadenhall using Saiph to 17 conduct an audit of Leadenhall's collateral in late 18 2023? 19 A. I'm invoking the fifth. 20 MR. BOLAND: Let me just insert an objection 21 to the form of that one after the fact, sorry about 22 that. 23 BY MR. DONOVAN: 24 Q. Did A-CAP object to Leadenhall performing an 25 audit of its collateral in 2023 because A-CAP knew that</p>

<p style="text-align: right;">Page 22</p> <p>01 collateral had been fictitiously pledged and double 02 pledged?</p> <p>03 MR. BOLAND: Object to the form.</p> <p>04 A. I'm invoking the fifth.</p> <p>05 BY MR. DONOVAN:</p> <p>06 Q. Did 777 Partners in A-CAP initially object to 07 Leadenhall performing an audit of Leadenhall's 08 collateral because they were concerned that Leadenhall 09 would find out that assets had been fictitiously pledged 10 or double pledged?</p> <p>11 MR. BOLAND: Object to the form.</p> <p>12 A. I'm invoking the fifth.</p> <p>13 BY MR. DONOVAN:</p> <p>14 Q. Do you know what the MP Fin computer system 15 is?</p> <p>16 A. I'm invoking the fifth.</p> <p>17 Q. Is the MP Fin Computer System, the system in 18 which the 777 Partners Capital Markets Group allocates 19 assets to lenders?</p> <p>20 A. I'm invoking the fifth.</p> <p>21 Q. Did you play any role in allocating assets to 22 lenders in MP Fin?</p> <p>23 MR. BOLAND: Object to the form.</p> <p>24 A. I'm invoking the fifth.</p> <p>25 BY MR. DONOVAN:</p>	<p style="text-align: right;">Page 24</p> <p>01 that we have a clear record.</p> <p>02 Is it fair to say that you don't have any 03 understanding of who made the decision to file this 04 lawsuit against Leadenhall, Saiph, Paul Kosinski and 05 Noah Davis?</p> <p>06 A. No.</p> <p>07 Q. Sorry, is it not fair to say that I'm asking 08 -- let me ask it one more time. Is it fair to say that 09 you don't have any understanding of who made the 10 decision to file this lawsuit against Leadenhall, Saiph, 11 Paul Kosinski and Noah Davis?</p> <p>12 A. I don't have a clear understanding.</p> <p>13 Q. Do you have any understanding of who made the 14 decision to file this lawsuit against Leadenhall, Saiph, 15 Paul Kosinski and Noah Davis?</p> <p>16 A. No.</p> <p>17 Q. Do you know whether this lawsuit was filed 18 against Leadenhall for the purpose of retaliating 19 against Leadenhall for filing the New York litigation?</p> <p>20 MR. BOLAND: Object to the form.</p> <p>21 A. I'm invoking the fifth.</p> <p>22 BY MR. DONOVAN:</p> <p>23 Q. Did you play any role in the decision to file 24 this lawsuit?</p> <p>25 A. How do you mean?</p>
<p style="text-align: right;">Page 23</p> <p>01 Q. Did you play any role in issuing compliance 02 reports to Leadenhall?</p> <p>03 A. I'm invoking the fifth.</p> <p>04 Q. Do you know who made the decision to file this 05 Florida lawsuit against Leadenhall based on Noah Davis' 06 alleged intrusions?</p> <p>07 MR. BOLAND: Object to the form.</p> <p>08 A. Could you repeat the --</p> <p>09 BY MR. DONOVAN:</p> <p>10 Q. Sure.</p> <p>11 A. -- the beginning of that?</p> <p>12 Q. Sure. Do you know who at 777 Partners or A- 13 CAP made the decision to file this lawsuit against 14 Leadenhall based on alleged intrusions by Noah Davis?</p> <p>15 MR. BOLAND: Object to the form.</p> <p>16 A. No.</p> <p>17 BY MR. DONOVAN:</p> <p>18 Q. All right. Fair to say you have no 19 understanding of who made the decision to file this 20 lawsuit?</p> <p>21 A. That's unclear to me.</p> <p>22 Q. Sorry, is my question unclear to you? Is that 23 what you mean?</p> <p>24 A. It's unclear, I don't know.</p> <p>25 Q. Okay. Let me just ask my question again so</p>	<p style="text-align: right;">Page 25</p> <p>01 Q. Let me ask it this way. Prior to the lawsuit 02 being filed in Florida, were you in favor of initiating 03 a lawsuit against Leadenhall based on intrusions by Noah 04 Davis?</p> <p>05 A. I don't know that I understand the question.</p> <p>06 Q. All right. What's your understanding of why 07 -- strike that.</p> <p>08 What's your understanding of why Noah Davis 09 allegedly entered into SuttonPark Capital's office 10 buildings?</p> <p>11 A. I don't have an understanding why.</p> <p>12 Q. You testified before that your understanding 13 of this lawsuit is that Noah Davis conducted 14 unauthorized physical entries into SuttonPark Capital's 15 office's -- office buildings, right?</p> <p>16 A. Well, no, I said that I read an article that 17 mentions, but I don't have any details or understanding 18 of why or how or any other information regarding the 19 incident.</p> <p>20 Q. That's fair. So, I'm just asking apart from 21 what you read about Noah Davis conducting unauthorized 22 physical entries into an office building, do you have 23 any understanding of whether Noah Davis conducted 24 unauthorized intrusions into 777 Partners computer 25 systems?</p>

<p style="text-align: right;">Page 26</p> <p>01 A. The only understanding is what I've read in 02 the news article, which may or may not be true. I don't 03 have any information regarding the incident.</p> <p>04 Q. So, is your understanding of this lawsuit that 05 Noah Davis on one single occasion entered into 777 06 Partners or SuttonPark Capital's office buildings?</p> <p>07 MR. BOLAND: Object to the form.</p> <p>08 A. I don't have enough information to answer 09 that. As I said, I've read the news article and that's 10 the extent of my knowledge.</p> <p>11 BY MR. DONOVAN:</p> <p>12 Q. That's fair. So, I understand what you were 13 saying. I'm trying to ask my question correctly here. 14 Do you have any understanding of whether, 15 aside from any physical -- sorry, withdrawn. 16 Do you have any understanding of whether Noah 17 Davis conducted unauthorized intrusions into 777 18 Partners computer systems aside from any physical entry 19 into an office building?</p> <p>20 A. Do I have an understanding of that?</p> <p>21 Q. Sure.</p> <p>22 A. I don't believe that I do. I -- as I said, 23 read an article and I can't recall the details of the 24 article, but as I said, I had heard that he had stolen 25 equipment, but I have no basis of that other than the</p>	<p style="text-align: right;">Page 28</p> <p>01 A. I have no information about the incident or, 02 I'm unsure how to answer that. I don't have any 03 information regarding your question.</p> <p>04 BY MR. DONOVAN:</p> <p>05 Q. Okay. That's fair. Do you have any evidence 06 or factual basis to believe that Leadenhall directed 07 Noah Davis to conduct unauthorized intrusions into 777 08 Partners computer systems?</p> <p>09 MR. BOLAND: Object to the form.</p> <p>10 A. I have no information regarding that question.</p> <p>11 BY MR. DONOVAN:</p> <p>12 Q. Do you have any evidence or factual basis to 13 believe that Leadenhall benefited in any way from any 14 information taken by Noah Davis?</p> <p>15 MR. BOLAND: Object to form.</p> <p>16 A. I'm going to invoke the fifth.</p> <p>17 BY MR. DONOVAN:</p> <p>18 Q. Do you have any evidence or factual basis to 19 believe that Leadenhall ever received any information 20 taken by Noah Davis via unauthorized intrusions?</p> <p>21 MR. BOLAND: Object to form.</p> <p>22 A. I'll invoke the fifth.</p> <p>23 BY MR. DONOVAN:</p> <p>24 Q. Would you agree with me that you have no 25 factual basis or evidence to believe that Leadenhall</p>
<p style="text-align: right;">Page 27</p> <p>01 article.</p> <p>02 Q. Got it. So, is it fair to say that you don't 03 know one way or the other whether outside of Noah Davis 04 allegedly stealing equipment, he also conducted 05 unauthorized intrusions into the 777 Partners computer 06 systems?</p> <p>07 A. I don't know.</p> <p>08 Q. Do you have any evidence or factual basis to 09 believe that Leadenhall directed Noah Davis to steal 10 computer equipment?</p> <p>11 MR. BOLAND: Object to form.</p> <p>12 A. I'm invoking the fifth.</p> <p>13 BY MR. DONOVAN:</p> <p>14 Q. Do you have any evidence or factual basis to 15 believe that Leadenhall directed Noah Davis to conduct 16 an unauthorized entry into 777 Partners office 17 buildings?</p> <p>18 MR. BOLAND: Object to form.</p> <p>19 A. I'm sorry, could you repeat that?</p> <p>20 BY MR. DONOVAN:</p> <p>21 Q. Sure. Do you have any evidence or factual 22 basis to believe that Leadenhall directed Noah Davis to 23 break into 777 Partners or SuttonPark Capital's office 24 buildings?</p> <p>25 MR. BOLAND: Object to form.</p>	<p style="text-align: right;">Page 29</p> <p>01 directed Noah Davis to conduct unauthorized intrusions 02 in 777 Partners or SuttonPark Capital's computer 03 systems?</p> <p>04 MR. BOLAND: Object to form.</p> <p>05 A. I'm invoking the fifth.</p> <p>06 MR. DONOVAN: Do you mind if we take a 5- 07 minute break?</p> <p>08 THE WITNESS: Of course, yeah.</p> <p>09 MR. DONOVAN: All right, thanks. We can go 10 off the record.</p> <p>11 (Thereupon, a short discussion was held off 12 record.)</p> <p>13 (Deposition resumed.)</p> <p>14 THE COURT REPORTER: We're back on the record.</p> <p>15 The time is 10:06 A.M.</p> <p>16 BY MR. DONOVAN:</p> <p>17 Q. Okay. Mr. Adnani, you ready?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. I'm going to refer to the borrowers as 20 the following entities, SPLCSS III, Dorchester 21 receivables II LLC, Insurety Agency Services LLC and 22 Signal SML 4 LLC.</p> <p>23 I'm going to refer to the guarantors as the 24 following entities, 777 Partners LLC and 600 Partners 25 LLC.</p>

<p style="text-align: right;">Page 30</p> <p>01 I'm going to refer to the servicer as 02 SuttonPark Servicing LLC and I'm going to refer to the 03 sellers as SuttonPark Capital LLC, Signal Medical 04 Receivables, LLC and Insurety Capital LLC. 05 All of those entities together I'm going to 06 refer to as the 777 entity Defendant's, which is how 07 those entities are defined in the New York litigation 08 between Leadenhall on the one hand and the 777 entity 09 Defendant's among other Defendant's on the other hand 10 and I'm going to refer to Advantage Capital Holdings, 11 LLC as A-CAP. 12 All right. Did the 777 entity Defendant's 13 pledge collateral to Leadenhall that was not free and 14 clear of other claims? 15 MR. BOLAND: Object to form. 16 A. I'm invoking the fifth. 17 BY MR. DONOVAN: 18 Q. Did the 777 entity Defendant's pledge 19 collateral to Leadenhall that the 777 entity Defendant's 20 had already pledged to other lenders? 21 MR. BOLAND: Object to form. 22 A. I'm invoking the fifth. 23 BY MR. DONOVAN: 24 Q. Did the 777 entity Defendant's pledge 25 collateral to Leadenhall that the 777 entity Defendant's</p>	<p style="text-align: right;">Page 32</p> <p>01 BY MR. DONOVAN: 02 Q. Before SuttonPark Capital ever purchased the 03 portfolio of assets from JG Wentworth in 2021, did Josh 04 Wander and Steven Pasko direct you to issue compliance 05 reports to Leadenhall false -- falsely stating that 06 assets were pledged to Leadenhall when they were not? 07 MR. BOLAND: Object to the form. 08 A. I'm invoking the fifth. 09 BY MR. DONOVAN: 10 Q. Let me ask that question again. Before 11 SuttonPark Capital ever purchased the portfolio of 12 assets from JG Wentworth in 2021, did Josh Wander and 13 Steven Pasko direct you to issue compliance reports to 14 Leadenhall, stating that assets had been pledged to 15 Leadenhall despite the fact that they had never been 16 purchased in the first place? 17 MR. BOLAND: Object to form. 18 A. I'm invoking the fifth. 19 BY MR. DONOVAN: 20 Q. Can you confirm that over the May 2021 to 21 November 2023 period, you knew that compliance reports 22 issued to Leadenhall contain false statements? 23 MR. BOLAND: Object to form. 24 A. I'm invoking the fifth. 25 BY MR. DONOVAN:</p>
<p style="text-align: right;">Page 31</p> <p>01 had not yet purchased? 02 MR. BOLAND: Object to the form. 03 A. I'm invoking the fifth. 04 BY MR. DONOVAN: 05 Q. Do you know what JG Wentworth is? 06 A. Yes. 07 Q. What is JG Wentworth 08 A. A wholesale seller of structured settlements, 09 I believe, servicer. 10 Q. What is a structured settlement? 11 A. I am invoking the fifth. 12 Q. In 2021, did SuttonPark Capital consider 13 purchasing a portfolio of structured settlements from JG 14 Wentworth? 15 A. I'm invoking the fifth. 16 Q. In 2021, did SuttonPark Capital consider 17 purchasing a portfolio of structured settlements from JG 18 Wentworth worth approximately \$250 million? 19 A. I'm invoking the fifth. 20 Q. Before SuttonPark Capital ever purchased those 21 assets from JG Wentworth, did Josh wander direct you to 22 allocate those assets to Leadenhall in the MP Fin 23 system? 24 MR. BOLAND: Object to the form. 25 A. I'm invoking the fifth.</p>	<p style="text-align: right;">Page 33</p> <p>01 Q. Isn't it true that of the \$250 million 02 portfolio that SuttonPark Capital considered purchasing 03 from JG Wentworth SuttonPark Capital only ultimately 04 purchased approximately \$1 million of the portfolio? 05 MR. BOLAND: Object to form. 06 A. I'm invoking the fifth. 07 BY MR. DONOVAN: 08 Q. Do you know that members of the SuttonPark 09 accounting department have been deposed in this action? 10 A. I'm invoking the fifth. 11 Q. Do you have any understanding of who the 12 accounting department says they expressly raised 13 concerns to about assets being pledged to Leadenhall 14 that were never actually purchased? 15 MR. BOLAND: Object to the form. 16 A. I'm invoking the fifth. 17 BY MR. DONOVAN: 18 Q. Would it surprise you to find out that the 19 accounting department at SuttonPark Capital has 20 testified under oath that they expressly raised concerns 21 to you that assets were pledged to Leadenhall, which 22 were never actually purchased? 23 MR. BOLAND: Object to the form. 24 A. I'm invoking the fifth. 25 BY MR. DONOVAN:</p>

<p style="text-align: right;">Page 34</p> <p>01 Q. Do you remember taking any of those concerns 02 raised by the accounting department to Josh Wander? 03 MR. BOLAND: Object to the form. 04 A. I'm invoking the fifth. 05 BY MR. DONOVAN: 06 Q. Did Josh Wander ever tell you or the 07 accounting department not to worry about the fact that 08 assets had been pledged to Leadenhall despite the fact 09 that they had never been purchased? 10 MR. BOLAND: Object to the form. 11 A. Invoking the fifth. 12 BY MR. DONOVAN: 13 Q. Do you think Josh Wander is trustworthy? 14 MR. BOLAND: Object to the form. 15 A. Invoking the fifth. 16 BY MR. DONOVAN: 17 Q. Do you think Josh Wander is a conman? 18 MR. BOLAND: Object to the form. 19 A. Invoking the fifth. 20 BY MR. DONOVAN: 21 Q. Do you think Steven Pasko is a conman? 22 MR. BOLAND: Object to the form. 23 A. Invoking the fifth. 24 BY MR. DONOVAN: 25 Q. Did Josh Wander or Steven Pasko ever instruct</p>	<p style="text-align: right;">Page 36</p> <p>01 MR. BOLAND: Object to the form. 02 A. Invoking fifth. 03 BY MR. DONOVAN: 04 Q. Were the 777 entity Defendants A-CAP, Kenneth 05 King, Josh Wander, and Steven Pasko part of an 06 association in fact? 07 A. Invoking the fifth. 08 BY MR. DONOVAN: 09 Q. How would you describe a Ponzi scheme? 10 A. Invoking the fifth. 11 Q. Did the 777 entity Defendants A-CAP, Kenneth 12 King, Josh Wander and Steven Pasko operate a Ponzi 13 scheme? 14 MR. BOLAND: Object to the form. 15 A. Invoking fifth. 16 BY MR. DONOVAN: 17 Q. Did A-CAP and Kenneth King make the 777 entity 18 Defendants appear to be a legitimate enterprise when it 19 was not by loaning billions of dollars to it and making 20 protective advances? 21 MR. BOLAND: Object to the form. 22 A. Invoking fifth. 23 BY MR. DONOVAN: 24 Q. Was the common purpose of the association 25 between the 777 entity Defendants Kenneth King, Josh</p>
<p style="text-align: right;">Page 35</p> <p>01 you to top up or top off receivables accounts to conceal 02 the fact that 777 Partners had never purchased assets 03 that were pledge to Leadenhall? 04 MR. BOLAND: Object to the form. 05 A. I'm invoking the fifth. 06 BY MR. DONOVAN: 07 Q. Did the 777 entity Defendants pledge 08 fictitious assets to Leadenhall? 09 MR. BOLAND: Object to the form. 10 A. I'm invoking the fifth. 11 BY MR. DONOVAN: 12 Q. Did the 777 entity Defendants double pledge 13 assets to Leadenhall? 14 MR. BOLAND: Objection. 15 A. Invoking the fifth. 16 BY MR. DONOVAN: 17 Q. Were assets double pledged or fictitiously 18 pledged to Leadenhall solely because of the actions of 19 the borrowers or guarantors? 20 MR. BOLAND: Object to the form. 21 A. Invoking the fifth. 22 BY MR. DONOVAN: 23 Q. Were the 7 -- strike that. Were the 777 24 entity Defendants A-CAP, Kenneth King, Josh Wander, and 25 Steven Pasko part of a criminal enterprise?</p>	<p style="text-align: right;">Page 37</p> <p>01 Wander and Steven Pasko to generate money for its 02 members by lying about the security backing lender's 03 debt. 04 MR. BOLAND: Object to the form. 05 A. Invoking the fifth. 06 BY MR. DONOVAN: 07 Q. Did A-CAP and Mr. King, control decision 08 making of the enterprise with the 777 entity Defendants 09 Josh Wander and Steven Pasko? 10 MR. BOLAND: Object to the form. 11 A. Invoking the fifth. 12 BY MR. DONOVAN: 13 Q. Was the structure of the criminal enterprise 14 between 777, the 777 entity Defendants, Kenneth King, 15 Josh Wander and Steven Pasko memorialized in a steering 16 committee, memorandum issued around April 2023? 17 MR. BOLAND: Object to the form. 18 A. Invoking the fifth. 19 BY MR. DONOVAN: 20 Q. When did you stop working in the physical 21 office space of 777 Partners? 22 A. Invoking the fifth. 23 Q. What was the address of 777 Partners former 24 office building? 25 A. 600 Brickell Ave.</p>

<p style="text-align: right;">Page 38</p> <p>01 Q. What floor of 600 Brickell Ave did you work 02 on? 03 A. The 19th. 04 Q. Did you sit in a shared office with Nick 05 Bennett? 06 A. Invoking the fifth. 07 Q. Did shared offices exist on sorry -- strike 08 that. You said in 19th floor? 09 A. Yes. 10 Q. Did shared offices exist on the 19th floor of 11 600 Brickell Avenue? 12 A. Invoking. 13 Q. Were you part of 777 Partners Capital Markets 14 Group? 15 A. Invoking the fifth. 16 Q. Did the 777 Partners Capital Markets Group 17 work in the same office from the period May 2021 to 18 April 2023, approximately? 19 A. Invoking the fifth. 20 Q. Did you and Nick Bennett share an office at 21 777 Partners offices from approximately May 2021 to 22 April 2023? 23 A. Invoking the fifth. 24 Q. Around April 2023, did A-CAP employees Carson 25 McGuffin and Mike Saliab move into your and Nick</p>	<p style="text-align: right;">Page 40</p> <p>01 MR. BOLAND: Object to the form. 02 A. Invoking the fifth. 03 BY MR. DONOVAN: 04 Q. Do you know whether the 777 entity Defendant's 05 A-CAP, Wander, Pasko and King used approximately \$600 06 million in debt provided by Leadenhall to purchase 07 professional football teams? 08 MR. BOLAND: Object to the form. 09 A. Invoking fifth. 10 BY MR. DONOVAN: 11 Q. Did the 777 entity Defendants A-CAP, Wander, 12 Pasko and King use \$100 million in debt provided by 13 Leadenhall to purchase or try to purchase football teams 14 and airlines? 15 MR. BOLAND: Object to the form. 16 A. Invoking fifth. 17 BY MR. DONOVAN: 18 Q. Did you play any role in 777 Partners attempt 19 to purchase Everton? 20 A. Invoking the fifth. 21 Q. Did the 777 entity Defendants issue false 22 compliance reports to Leadenhall over the May 2021 to 23 November 2023 period. 24 MR. BOLAND: Object to the form. 25 A. Invoking the fifth.</p>
<p style="text-align: right;">Page 39</p> <p>01 Bennett's offices at 777 Partners offices? 02 MR. BOLAND: Object to the form. 03 A. Invoking the fifth. 04 BY MR. DONOVAN: 05 Q. Would you agree with me that Kenneth King and 06 A-CAP exercised total control over the 777 entity 07 Defendants? 08 MR. BOLAND: Object to the form. 09 A. Invoking the fifth. 10 BY MR. DONOVAN: 11 Q. Would you agree with me that A-CAP and Kenneth 12 King determined whether the 777 entity Defendants could 13 make payroll and enter into contracts? 14 MR. BOLAND: Object to the form. 15 A. Invoking the fifth. 16 BY MR. DONOVAN: 17 Q. Did Kenneth King and A-CAP sit at the top of 18 the hierarchy in the criminal enterprise with the 777 19 entity Defendants Josh Wander and Steven Pasko? 20 MR. BOLAND: Object to the form. 21 A. Invoking fifth. 22 BY MR. DONOVAN: 23 Q. Did Kenneth King control two different 24 organizations that exist the defraud lenders Number one, 25 A-CAP and Number two the 777 entity Defendants?</p>	<p style="text-align: right;">Page 41</p> <p>01 BY MR. DONOVAN: 02 Q. What's your understanding of a compliance 03 report? 04 A. Invoking the fifth. 05 Q. Do you understand that a compliance report 06 contains list of assets, purportedly pledged exclusively 07 to a lender? 08 MR. BOLAND: Object to the form. 09 A. Invoking the fifth. 10 BY MR. DONOVAN: 11 Q. Did the 777 entity Defendants issue 12 approximately 60 false monthly compliance reports to 13 Leadenhall? 14 MR. BOLAND: Objection. 15 A. Invoking fifth. 16 BY MR. DONOVAN: 17 Q. Were the compliance reports false because they 18 contained lists of assets extensively pledged 19 exclusively to Leadenhall, which were either double 20 pledged or which were never purchased in the first 21 place? 22 MR. BOLAND: Object to the form. 23 A. Invoking the fifth. 24 BY MR. DONOVAN: 25 Q. Did the 777 entity Defendants A-CAP, Kenneth</p>

<p style="text-align: right;">Page 42</p> <p>01 King, Josh Wander and Steven Pasko participate in the 02 scheme to issue compliance reports to Leadenhall from 03 May 2021 to November 2023 falsely stating that assets 04 were pledged exclusively to Leadenhall and they were 05 not?</p> <p>06 MR. BOLAND: Object to the form.</p> <p>07 A. Invoking fifth.</p> <p>08 BY MR. DONOVAN:</p> <p>09 Q. Did that criminal enterprise work together to 10 issue false compliance reports to Leadenhall over the 11 May 2021 to November 2023?</p> <p>12 MR. BOLAND: Object to the form.</p> <p>13 A. Invoking the fifth.</p> <p>14 BY MR. DONOVAN:</p> <p>15 Q. Do you remember, preparing restated compliance 16 reports for Leadenhall around the January 2024 period?</p> <p>17 A. Invoking the fifth.</p> <p>18 Q. And did those restated compliance reports 19 issued in January 2024 show that going back to March 20 2023, the 777 entity Defendants had double pledged or 21 fictitiously pledged approximately \$350 million in 22 collateral to Leadenhall?</p> <p>23 MR. BOLAND: Object to the form.</p> <p>24 A. Invoking the fifth.</p> <p>25 BY MR. DONOVAN:</p>	<p style="text-align: right;">Page 44</p> <p>01 Q. Did Kenneth King knowingly issue false 02 compliance reports to Leadenhall from May 2021 to 03 November 2023?</p> <p>04 MR. BOLAND: Object to the form.</p> <p>05 A. Invoking the fifth.</p> <p>06 BY MR. DONOVAN:</p> <p>07 Q. Did the enterprise between the 777 entity 08 Defendants in A-CAP issue forged or photo-shopped bank 09 statements to Leadenhall to show that money was in bank 10 accounts when it was not in those accounts?</p> <p>11 MR. BOLAND: Object to the form.</p> <p>12 A. Invoking the fifth.</p> <p>13 BY MR. DONOVAN:</p> <p>14 Q. Did the 777 entity Defendants alter 15 receivables in the 777 Partners computer system called 16 MP FIN to make it appear as though assets had been 17 pledged exclusively to Leadenhall when they had not?</p> <p>18 MR. BOLAND: Object to the form.</p> <p>19 A. Invoking the fifth.</p> <p>20 BY MR. DONOVAN:</p> <p>21 Q. Do you know whether A-CAP and the 777 entity 22 Defendants engaged in sham or restructuring negotiations 23 with Leadenhall in 2024 to avoid bringing defraud to 24 light?</p> <p>25 MR. BOLAND: Object to the form.</p>
<p style="text-align: right;">Page 43</p> <p>01 Q. When I use the term knowingly, I mean 02 intentionally and deliberately and not by mistake. Did 03 the 777 entity Defendants knowingly issue false 04 compliance reports to Leadenhall from May 2021 to 05 November 2023?</p> <p>06 MR. BOLAND: Object to the form.</p> <p>07 A. Invoking fifth.</p> <p>08 BY MR. DONOVAN:</p> <p>09 Q. Did Josh Wander knowingly issue false 10 compliance reports to Leadenhall from May 2021 to 11 November 2023?</p> <p>12 MR. BOLAND: Object to the form.</p> <p>13 A. Invoking the fifth.</p> <p>14 BY MR. DONOVAN:</p> <p>15 Q. Did Steven Pasko knowingly issue false 16 compliance reports to Leadenhall from May 2021 to 17 November 2023?</p> <p>18 MR. BOLAND: Object to the form.</p> <p>19 A. Invoking fifth.</p> <p>20 BY MR. DONOVAN:</p> <p>21 Q. Did A-CAP knowingly issue false compliance 22 reports to Leadenhall from May 2021, November 2023?</p> <p>23 MR. BOLAND: Object to the form.</p> <p>24 A. Invoking fifth.</p> <p>25 BY MR. DONOVAN:</p>	<p style="text-align: right;">Page 45</p> <p>01 A. Invoking the fifth.</p> <p>02 BY MR. DONOVAN:</p> <p>03 Q. Do you know whether the 777 entity Defendants 04 recorded in servicing notes in 777 Partners computer 05 system that assets had been double pledged to 06 Leadenhall?</p> <p>07 MR. BOLAND: Object to the form.</p> <p>08 A. Invoking the fifth.</p> <p>09 BY MR. DONOVAN:</p> <p>10 Q. Did the 777 entity Defendants knowingly double 11 pledge assets to Leadenhall?</p> <p>12 MR. BOLAND: Object to the form.</p> <p>13 A. Invoking the fifth.</p> <p>14 BY MR. DONOVAN:</p> <p>15 Q. Did the 777 entity Defendants knowingly pledge 16 assets to Leadenhall that had never been purchased in 17 the first place?</p> <p>18 MR. BOLAND: Object to the form.</p> <p>19 A. Invoking the fifth.</p> <p>20 BY MR. DONOVAN:</p> <p>21 Q. Did A-CAP and Kenneth King knowingly double 22 pledge assets to Leadenhall?</p> <p>23 MR. BOLAND: Object to the form.</p> <p>24 A. Invoking fifth.</p> <p>25 BY MR. DONOVAN:</p>

<p style="text-align: right;">Page 46</p> <p>01 Q. Did A-CAP and Kenneth King knowingly pledge 02 assets to Leadenhall that had never been purchased in 03 the first place?</p> <p>04 MR. BOLAND: Object to the form.</p> <p>05 A. Invoking the fifth.</p> <p>06 BY MR. DONOVAN:</p> <p>07 Q. Did the 777 entity Defendants operating at the 08 direction of Kenneth King, Josh Wander, Steven Pasko and 09 A-CAP create fake records in 777 Partners computer 10 system -- systems to give the appearance that assets had 11 been pledged to Leadenhall?</p> <p>12 MR. BOLAND: Object to the form.</p> <p>13 A. Invoking the fifth.</p> <p>14 BY MR. DONOVAN:</p> <p>15 Q. Did the 777 entity Defendants A-CAP, Kenneth 16 King, Josh Wander, and Steven Pasko attempt to stop 17 Leadenhall from conducting an audit of its collateral 18 because it knew that an audit would show that assets had 19 been double pledged or fictitiously pledged?</p> <p>20 MR. BOLAND: Object to the form.</p> <p>21 A. Invoking the fifth.</p> <p>22 BY MR. DONOVAN:</p> <p>23 Q. Around March 2023, did A-CAP employees move 24 into your and Nick Bennett's offices?</p> <p>25 A. Invoking the fifth.</p>	<p style="text-align: right;">Page 48</p> <p>01 MR. BOLAND: Object to the form.</p> <p>02 A. Invoking fifth.</p> <p>03 BY MR. DONOVAN:</p> <p>04 Q. Do you remember Josh Wander and Steven Pasko 05 resigning as managers of 777 Partners and 600 Partners 06 in May 2024?</p> <p>07 A. Invoking.</p> <p>08 Q. Sorry, invoking the fifth, right?</p> <p>09 A. Invoking fifth.</p> <p>10 Q. Yeah.</p> <p>11 A. Sorry.</p> <p>12 Q. Do you want a drink of water or no?</p> <p>13 A. I got.</p> <p>14 Q. Okay.</p> <p>15 A. Thank you.</p> <p>16 Q. Do -- withdrawn. Did 777 Partners and 600 17 Partners operate as one single entity over the May 2021 18 to May 2024 period?</p> <p>19 MR. BOLAND: Object to the form.</p> <p>20 A. Invoking fifth.</p> <p>21 BY MR. DONOVAN:</p> <p>22 Q. Is it fair to say there's no distinction 23 whatsoever between 777 Partners and 600 Partners prior 24 to May 2024?</p> <p>25 MR. BOLAND: Object to the form.</p>
<p style="text-align: right;">Page 47</p> <p>01 Q. Around March 2023, did you and Nick Bennett 02 begin reporting directly to A-CAP employees Mike Saliab 03 and Carson McGuffin?</p> <p>04 A. Invoking fifth.</p> <p>05 Q. Did A-CAP employees Carson McGuffin and Mike 06 Saliab direct you to continue to issue false compliance 07 reports to Leadenhall from the March 2023 to November 08 2023 period?</p> <p>09 MR. BOLAND: Object to the form.</p> <p>10 A. Invoking fifth.</p> <p>11 BY MR. DONOVAN:</p> <p>12 Q. Prior to moving into 777 Partners offices in 13 March 2023, did A-CAP know that the 777 entity 14 Defendants were issuing false compliance reports to 15 Leadenhall?</p> <p>16 MR. BOLAND: Object to the form.</p> <p>17 A. Invoking fifth.</p> <p>18 BY MR. DONOVAN:</p> <p>19 Q. Who at 777 Partners would know the most about 20 compliance reports issued to Leadenhall?</p> <p>21 A. Invoking fifth.</p> <p>22 Q. Would it surprise you to find out that other 23 employees have testified that you and Nick Bennett would 24 know the most about compliance reports issued to 25 Leadenhall?</p>	<p style="text-align: right;">Page 49</p> <p>01 A. Invoking fifth.</p> <p>02 BY MR. DONOVAN:</p> <p>03 Q. Prior to May 2024, did Josh Wander and Steven 04 Pasko exercise complete dominion in control over 777 05 Partners and 600 Partners?</p> <p>06 MR. BOLAND: Object to the form.</p> <p>07 A. Invoking fifth.</p> <p>08 BY MR. DONOVAN:</p> <p>09 Q. Prior to May 2024, were 777 Partners and 600 10 Partners mere instrumentalities of Josh Wander, Steven 11 Pasko and Kenneth King?</p> <p>12 MR. BOLAND: Object to the form.</p> <p>13 A. Invoking fifth.</p> <p>14 BY MR. DONOVAN:</p> <p>15 Q. Did Josh Wander, Steven Pasko and Kenneth King 16 use 777 Partners and 600 Partners as instrumentalities 17 to defraud Leadenhall?</p> <p>18 MR. BOLAND: Object to the form.</p> <p>19 A. Invoking the fifth.</p> <p>20 BY MR. DONOVAN:</p> <p>21 Q. Did the fraud perpetrated by Wander and Pasko 22 through 777 Partners and 600 Partners result in a loss 23 to Leadenhall?</p> <p>24 MR. BOLAND: Object to the form.</p> <p>25 A. Invoking fifth.</p>

<p style="text-align: right;">Page 50</p> <p>01 BY MR. DONOVAN:</p> <p>02 Q. What's your understanding of the word 03 insolvent?</p> <p>04 A. Going to invoke the fifth.</p> <p>05 Q. So, when I use the term insolvents, what I 06 mean is that the 777 entity Defendants could not meet 07 their debts and financial obligations as they became 08 due.</p> <p>09 So, did there come a time when the 777 entity 10 Defendants became insolvent?</p> <p>11 MR. BOLAND: Object to the form.</p> <p>12 A. I'm invoking fifth.</p> <p>13 BY MR. DONOVAN:</p> <p>14 Q. Is it fair to say that but for loans and 15 protective advances provided by A-CAP, the 777 entity 16 Defendants were insolvent over the May 2021 to May 2024 17 period?</p> <p>18 MR. BOLAND: Object to the form.</p> <p>19 A. Invoking the fifth.</p> <p>20 BY MR. DONOVAN:</p> <p>21 Q. Did Josh Wander and Steven Pasko use the 22 corporate funds of 777 Partners and 600 Partners for 23 personal use?</p> <p>24 MR. BOLAND: Object to the form.</p> <p>25 A. Invoking fifth.</p>	<p style="text-align: right;">Page 52</p> <p>01 Q. Did 777 Partners, 600 Partners, Josh Wander 02 and Steven Pasko, co-mingle corporate and professional 03 -- sorry, withdrawn. Let me start again.</p> <p>04 Did 777 Partners, 600 Partners, Josh Wander 05 and Steven Pasko, co-mingle corporate and personal 06 funds?</p> <p>07 MR. BOLAND: Object to the form.</p> <p>08 A. Invoking fifth.</p> <p>09 BY MR. DONOVAN:</p> <p>10 Q. Were 777 Partners and 600 Partners operating 11 as one single profit center?</p> <p>12 MR. BOLAND: Object to the form.</p> <p>13 A. Invoking fifth.</p> <p>14 BY MR. DONOVAN:</p> <p>15 Q. Did 777 Partners and 600 Partners hold regular 16 board meetings?</p> <p>17 MR. BOLAND: Objection.</p> <p>18 A. Invoking fifth.</p> <p>19 BY MR. DONOVAN:</p> <p>20 Q. Isn't it true that 777 Partners and 600 21 Partners stopped holding regular board meetings around 22 the latter half of 2022?</p> <p>23 MR. BOLAND: Object to the form.</p> <p>24 A. Invoking the fifth.</p> <p>25 BY MR. DONOVAN:</p>
<p style="text-align: right;">Page 51</p> <p>01 BY MR. DONOVAN:</p> <p>02 Q. Did Josh Wander and Steven Pasko use a 03 corporate jet of 777 Partners and 600 Partners for 04 personal use?</p> <p>05 MR. BOLAND: Object to the form.</p> <p>06 A. Invoking fifth.</p> <p>07 BY MR. DONOVAN:</p> <p>08 Q. Can you confirm that there was an overlap in 09 ownership officers, directors and personnel between 777 10 Partners and 600 Partners?</p> <p>11 MR. BOLAND: Object to the form.</p> <p>12 A. Invoking fifth.</p> <p>13 BY MR. DONOVAN:</p> <p>14 Q. Can you confirm that 777 Partners and 600 15 Partners, had common office space addresses e-mail 16 addresses and telephone numbers?</p> <p>17 MR. BOLAND: Object to the form.</p> <p>18 A. Invoking fifth.</p> <p>19 BY MR. DONOVAN:</p> <p>20 Q. Can you confirm that 777 Partners, 600 21 Partners and other entities within the 777 system did 22 not transact with each other at arm's length?</p> <p>23 MR. BOLAND: Object to the form.</p> <p>24 A. Invoking fifth.</p> <p>25 BY MR. DONOVAN:</p>	<p style="text-align: right;">Page 53</p> <p>01 Q. Did 777 Partners and 600 Partners cease 02 holding regular board meetings because A-CAP had 03 exercised further control over the enterprise around the 04 period late 2022 to early 2023?</p> <p>05 MR. BOLAND: Object to the form.</p> <p>06 A. Invoking fifth.</p> <p>07 BY MR. DONOVAN:</p> <p>08 Q. Did 777 Partners and 600 Partners exercise any 09 corporate formalities?</p> <p>10 MR. BOLAND: Object to the form.</p> <p>11 A. How do you mean? Can you repeat that?</p> <p>12 BY MR. DONOVAN:</p> <p>13 Q. Sure. Did 777 Partners and 600 Partners 14 exercise any corporate formalities?</p> <p>15 MR. BOLAND: Object to the form.</p> <p>16 A. Invoking fifth.</p> <p>17 BY MR. DONOVAN:</p> <p>18 Q. Do you understand, what I mean by corporate 19 formalities?</p> <p>20 A. I believe I have an idea.</p> <p>21 Q. What's your idea?</p> <p>22 A. Well, I think it would be beneficial for you 23 to elaborate.</p> <p>24 Q. Sure. So, when I use the term corporate 25 formalities, I mean things like regular board meetings,</p>

<p style="text-align: right;">Page 54</p> <p>01 minutes taken at board meetings, specifically delineated 02 roles between officers and managers formal annualized or 03 regular reporting things like that.</p> <p>04 Fair?</p> <p>05 A. Understood.</p> <p>06 Q. Okay. Did 777 Partners and 600 Partners 07 exercise corporate formalities?</p> <p>08 MR. BOLAND: Object to the form.</p> <p>09 A. I'm going to exercise the fifth.</p> <p>10 BY MR. DONOVAN:</p> <p>11 Q. Did the 777 entity Defendants routinely 12 guarantee the debt or debt obligations of other 13 affiliates within the 777 corporate system?</p> <p>14 MR. BOLAND: Object to the form.</p> <p>15 A. I'm going to invoke the fifth.</p> <p>16 BY MR. DONOVAN:</p> <p>17 Q. Did Josh Wander and Steven Pasko routinely 18 guarantee the debt on a personal basis of other entities 19 within the 777 Partners corporate system?</p> <p>20 MR. BOLAND: Object to the form.</p> <p>21 A. Invoking fifth.</p> <p>22 BY MR. DONOVAN:</p> <p>23 Q. Is 600 Partners a shell corporate entity which 24 exists solely to funnel money up to Steven Pasko?</p> <p>25 MR. BOLAND: Object to the form.</p>	<p style="text-align: right;">Page 56</p> <p>01 document to a shared drive and you tell one of your 02 colleagues "Hey, I'm going to save this document to the 03 shared drive," what do you call that shared drive or 04 network folder?</p> <p>05 MR. BOLAND: Object to the form.</p> <p>06 A. It would depend on the company.</p> <p>07 BY MR. DONOVAN:</p> <p>08 Q. When you refer to the company, are you 09 referring to companies within the 777 system or lenders?</p> <p>10 MR. BOLAND: Object to the form.</p> <p>11 A. Within the 777 system.</p> <p>12 BY MR. DONOVAN:</p> <p>13 Q. Fair. So, for 777 Partners specifically, is 14 there a shared drive where employees can save and access 15 documents collectively?</p> <p>16 A. Yes. Yes.</p> <p>17 Q. What do employees call that, shared drive or 18 network folder?</p> <p>19 MR. BOLAND: Object to the form.</p> <p>20 A. Again, there were several, so you would have 21 to be more specific.</p> <p>22 BY MR. DONOVAN:</p> <p>23 Q. Can you name for me, the several that you 24 remember?</p> <p>25 A. I believe SharePoint or Dropbox were among the</p>
<p style="text-align: right;">Page 55</p> <p>01 A. Invoking fifth.</p> <p>02 BY MR. DONOVAN:</p> <p>03 Q. Do you know whether the 777 entity Defendants 04 maintain any corporate records?</p> <p>05 MR. BOLAND: Object to the form.</p> <p>06 A. Invoking fifth.</p> <p>07 BY MR. DONOVAN:</p> <p>08 Q. Does triple -- sorry, withdrawn. Did 777 09 Partners have a shared drive or a network folder where 10 documents were saved?</p> <p>11 A. I believe so.</p> <p>12 Q. You remember what was -- sorry. Do you 13 remember what it was called?</p> <p>14 A. For what specifically, I believe, there were 15 several.</p> <p>16 Q. Sure. So, you testified that 777 Partners has 17 a shared folder or a network drive where team members 18 can share and access documents, right?</p> <p>19 A. Yes.</p> <p>20 Q. Does that shared folder or network drive go by 21 a name by 777 Partners employees?</p> <p>22 MR. BOLAND: Object to the form.</p> <p>23 A. I am going to invoke the fifth.</p> <p>24 BY MR. DONOVAN:</p> <p>25 Q. Well, I'm just asking if you have to save a</p>	<p style="text-align: right;">Page 57</p> <p>01 few that I recall.</p> <p>02 Q. Do they have specific names or do you just 03 call them SharePoint or Dropbox?</p> <p>04 A. In regard to what?</p> <p>05 Q. So, I'll give you an example. I work at a law 06 firm and when we have to save documents, we say things 07 like, can you save it to the Z Drive or can you save it 08 to the 777 Partners system within the Z Drive or 09 something like that.</p> <p>10 Do employees refer to specific folders where 11 they saved documents in that manner or no?</p> <p>12 MR. BOLAND: Object to the form.</p> <p>13 A. For me personally or other?</p> <p>14 BY MR. DONOVAN:</p> <p>15 Q. Oh yeah, sure. Let's start with you 16 personally. Like if you were going to save a document 17 so that others could access the document within a shared 18 folder or network drive.</p> <p>19 How would you describe the name of the 20 SharePoint or the Dropbox or the share folder in which 21 you are saving the document?</p> <p>22 A. You would say the name of -- well, I would 23 assume you would say the name of which you saved it to.</p> <p>24 Q. I see. So, would you say like, I'm going to 25 save this to the 777 Partner SharePoint?</p>

<p style="text-align: right;">Page 58</p> <p>01 A. I am not sure specifically; I would assume 02 several different ways of articulating the location of 03 any sort of file depending on the company.</p> <p>04 Q. Sure. So, I'm just asking for 777 Partners 05 specifically. What are the folder or network drive 06 names for employee saved documents?</p> <p>07 A. Again, there's quite a few portfolio 08 companies, so it's difficult to answer that question 09 specifically.</p> <p>10 Q. I see. So, is it fair to say that folders on 11 the SharePoint or Dropbox are organized by Portfolio 12 Company?</p> <p>13 MR. BOLAND: Object to the form.</p> <p>14 A. I'm not sure, how to answer that.</p> <p>15 BY MR. DONOVAN:</p> <p>16 Q. Well, so triple -- were you going to -- sorry, 17 I didn't mean to cut you off there.</p> <p>18 A. No, no, go ahead.</p> <p>19 Q. 777 Partners LLC is not a portfolio company, 20 right?</p> <p>21 A. No.</p> <p>22 Q. Would you describe it, as a holding company?</p> <p>23 MR. BOLAND: Object to the form.</p> <p>24 A. I would.</p> <p>25 BY MR. DONOVAN:</p>	<p style="text-align: right;">Page 60</p> <p>01 A. I'm going to invoke the fifth.</p> <p>02 BY MR. DONOVAN:</p> <p>03 Q. Has anyone ever instructed you to delete 04 documents?</p> <p>05 A. I'm going to invoke the fifth.</p> <p>06 Q. Let me try it again. Has anyone during your 07 employment at 777 Partners instructed you to delete 08 documents?</p> <p>09 MR. BOLAND: Object to the form.</p> <p>10 A. I'm going to invoke the fifth.</p> <p>11 BY MR. DONOVAN:</p> <p>12 Q. Has anyone at 777 Partners instructed you to 13 delete documents concerning Leadenhall?</p> <p>14 MR. BOLAND: Object to the form.</p> <p>15 A. I'm going to invoke the fifth.</p> <p>16 BY MR. DONOVAN:</p> <p>17 Q. Has anyone at 777 Partners instructed you to 18 not leave a paper trail for communications involving 19 Leadenhall?</p> <p>20 MR. BOLAND: Object to the form.</p> <p>21 A. I'm going to invoke the fifth.</p> <p>22 BY MR. DONOVAN:</p> <p>23 Q. Do you know, whether Josh Wander communicated 24 with you and Nick Bennett over FaceTime because he was concerned about leaving a paper trail of fraud?</p>
<p style="text-align: right;">Page 59</p> <p>01 Q. So, I'm asking for documents concerning the 02 777 Partners holding company.</p> <p>03 What is the name of the shared folder or 04 network drive in which you saved documents apart from 05 the portfolio companies?</p> <p>06 MR. BOLAND: Object to the form.</p> <p>07 A. Again, it's difficult to answer that I'm not 08 sure, there were several and it would depend on the 09 instance.</p> <p>10 BY MR. DONOVAN:</p> <p>11 Q. Well, so if I were looking for documents on 12 the shared drive which concerned Leadenhall, where would 13 I look?</p> <p>14 A. I'm going to invoke the fifth.</p> <p>15 Q. Is there a folder on the 777 Partners shared 16 network or shared folder named or otherwise referring to 17 Leadenhall?</p> <p>18 MR. BOLAND: Object to the form.</p> <p>19 A. I'm going to invoke the fifth.</p> <p>20 BY MR. DONOVAN:</p> <p>21 Q. Do you know how often the MP FIN system -- 22 sorry, strike that.</p> <p>23 Have you ever received a document preservation 24 notice concerning the Leadenhall lawsuits?</p> <p>25 MR. BOLAND: Object to the form.</p>	<p style="text-align: right;">Page 61</p> <p>01 MR. BOLAND: Object to the form.</p> <p>02 A. I'm going to invoke the fifth.</p> <p>03 BY MR. DONOVAN:</p> <p>04 Q. Around the period March 2023, did A-CAP 05 representatives, Kenneth King, Mike Saliab and Carson 06 McGuffin start listening in on your phone calls?</p> <p>07 MR. BOLAND: Object to the form.</p> <p>08 A. I'm going to invoke the fifth.</p> <p>09 BY MR. DONOVAN:</p> <p>10 Q. Did Josh Wander and Steven Pasko use 777 11 Partners and 600 Partners as trade names to take in 12 money from lenders under false pretenses and shuffle it 13 around to various money losing entities?</p> <p>14 MR. BOLAND: Object to the form.</p> <p>15 A. Invoking fifth.</p> <p>16 BY MR. DONOVAN:</p> <p>17 Q. Did A-CAP and King control the guarantors 18 every move in inducing Leadenhall to provide over \$600 19 million in debt funding to the 777 entity Defendants?</p> <p>20 A. Invoking fifth.</p> <p>21 Q. Did A-CAP, the 777 entity Defendants Wander, 22 Pasko and King defraud Leadenhall out of approximately 23 \$600 million and shuffle it around to various money 24 losing shell entities?</p> <p>25 MR. BOLAND: Object to the form.</p>

	Page 62	Page 64
01	A. Invoking fifth.	
02	BY MR. DONOVAN:	
03	Q. Did A-CAP, the 777 entity Defendants Wander,	
04	Pasko and King use money drawn from Leadenhall to make	
05	risky bets on professional football teams, airlines and	
06	luxury condos?	
07	MR. BOLAND: Object to the form.	
08	A. Invoking fifth.	
09	MR. DONOVAN: Can we take a 5-minute break?	
10	THE WITNESS: Sure.	
11	THE COURT REPORTER: We're going off record.	
12	The time is 10:58 A.M.	
13	(Thereupon, a short discussion was held off	
14	record.)	
15	(Deposition resumed.)	
16	THE COURT REPORTER: We are back on the	
17	record. The time is 11:15 A.M.	
18	BY MR. DONOVAN:	
19	Q. All right. Mr. Adnani, you ready?	
20	A. Yes.	
21	Q. Okay. Did the Plaintiffs in this Florida	
22	action, file the action solely to retaliate against	
23	Leadenhall for bringing the New York Action?	
24	MR. BOLAND: Object to form.	
25	A. Invoking fifth.	
	Page 63	Page 65
01	BY MR. DONOVAN:	
02	Q. Did the Plaintiffs in this Florida action file	
03	the action solely to get even with Leadenhall because	
04	Leadenhall filed a New York action?	
05	MR. BOLAND: Object to the form.	
06	A. Invoking fifth.	
07	THE COURT REPORTER: Mr. Boland, can you speak	
08	a little bit louder? I apologize. It's very	
09	feeble.	
10	MR. BOLAND: Yeah, it was object to the form.	
11	I try not to interrupt the question if I can.	
12	THE COURT REPORTER: Thank you.	
13	THE WITNESS: You can hear me?	
14	THE COURT REPORTER: Yes, I can hear you.	
15	THE WITNESS: Okay.	
16	BY MR. DONOVAN:	
17	Q. Did Plaintiffs file the Florida action in bad	
18	faith for the sole purpose of trying to injure	
19	Leadenhall?	
20	MR. BOLAND: Object to the form.	
21	A. Invoking fifth.	
22	BY MR. DONOVAN:	
23	Q. Do you know that 777 Partners is currently the	
24	subject of an investigation by the Department of	
25	Justice?	
		the witness, Mr. Morlan. Thank you.
		THE WITNESS: Thank you.
		DIRECT EXAMINATION
		BY MR. MORLAN III:
		Q. Good morning, Mr. Adnani. My name is Harold
		Morlan. I represent Paul Kosinski and Saiph Consulting
		LLC in this action.
		Have you ever heard of Saiph Consulting LLC
		before?
		A. I have heard of them.
		Q. And have you ever heard of Paul Kosinski
		before?
		A. Yes.
		Q. And how did you first become familiar with
		Saiph Consulting LLC?
		A. I don't recall specifically.
		Q. What do you know about Saiph Consulting LLC?
		MR. BOLAND: Object to the form.
		A. They provide a consulting service for
		different financial needs I believe, but I'm not 100%
		certain exactly the extent of their business.
		BY MR. MORLAN III:
		Q. And when I say the collateral audit that's at
		issue in this litigation, do you know what I'm referring
		to?

<p style="text-align: right;">Page 66</p> <p>01 A. I'm invoking fifth.</p> <p>02 Q. Is it your understanding that Leadenhall 03 retained a Saiph Consulting LLC, to perform an audit of 04 the collateral that was pledged or to be pledged to 05 Leadenhall in the connection -- in connection with 06 certain credit facilities?</p> <p>07 A. I'm going to invoke the fifth.</p> <p>08 Q. How long have you worked for 777 Partners?</p> <p>09 A. Roughly seven years, I believe.</p> <p>10 MR. BOLAND: Object to the form.</p> <p>11 BY MR. MORLAN III:</p> <p>12 Q. And what was your title when you started 13 working there?</p> <p>14 A. I'm going to invoke the fifth.</p> <p>15 Q. And can you walk me through the history of 16 your, the various positions you've held at 777 Partners, 17 since you began working there approximately seven years 18 ago?</p> <p>19 A. I am going to invoke the fifth.</p> <p>20 Q. Did you know Paul Kosinski when he worked for 21 SuttonPark Capital?</p> <p>22 A. Yes.</p> <p>23 Q. Did you have occasion to work with, 24 Mr. Kosinski back then?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 68</p> <p>01 disagreements that you can recall, prior to his 02 departure from SuttonPark Capital?</p> <p>03 A. Going to invoke the fifth.</p> <p>04 Q. Have you ever heard anybody make any 05 disparaging remarks about Mr. Kosinski?</p> <p>06 A. Going to invoke the fifth.</p> <p>07 Q. Do you feel like you've spent enough time 08 working with Mr. Kosinski prior to his departure in late 09 2020 to have insights into his professional reputation?</p> <p>10 MR. BOLAND: Object to form.</p> <p>11 A. Going to invoke the fifth.</p> <p>12 BY MR. MORLAN, III:</p> <p>13 Q. Do you feel like you worked with Mr. Kosinski 14 prior to his departure in 2020 enough to have insights 15 into his character as would pertain to his business 16 activities?</p> <p>17 MR. BOLAND: Object to form.</p> <p>18 A. I'm going to invoke the fifth.</p> <p>19 BY MR. MORLAN, III:</p> <p>20 Q. Are you aware of any allegations of 21 impropriety against Paul Kosinski?</p> <p>22 A. I'm going to invoke the fifth.</p> <p>23 Q. Are you aware of the allegations against 24 Mr. Kosinski and Saiph Consulting in the lawsuit for 25 which your deposition is being taken today?</p>
<p style="text-align: right;">Page 67</p> <p>01 Q. And did you work with Mr. Kosinski enough such 02 that you would have insight into his character?</p> <p>03 MR. BOLAND: Objection.</p> <p>04 A. In what regard?</p> <p>05 BY MR. MORLAN, III:</p> <p>06 Q. What -- Were you familiar with the -- 07 Mr. Kosinski's job role prior to him leaving SuttonPark 08 Capital in late 2020?</p> <p>09 A. Yes.</p> <p>10 Q. Okay. In what capacities, did you have -- if 11 any, did you have professional interaction with 12 Mr. Kosinski prior to his leaving SuttonPark Capital?</p> <p>13 MR. BOLAND: Object to form.</p> <p>14 A. He was the CEO.</p> <p>15 BY MR. MORLAN, III:</p> <p>16 Q. As you sit here today, are you sure whether he 17 was the CEO or the CFO?</p> <p>18 A. I believe he was the CEO.</p> <p>19 Q. And did you work on any specific projects with 20 Mr. Kosinski prior to his departure?</p> <p>21 A. Going to invoke the fifth.</p> <p>22 Q. Did you report to Mr. Kosinski at any time 23 during your tenure at SuttonPark?</p> <p>24 A. Yes.</p> <p>25 Q. And did you and Mr. Kosinski ever have any</p>	<p style="text-align: right;">Page 69</p> <p>01 A. Could you repeat that? I apologize.</p> <p>02 Q. Sure. Are you aware of the allegations 03 against Mr. Kosinski and Saiph Consulting in this 04 lawsuit that we're here on today?</p> <p>05 A. Not entirely, but I'm --</p> <p>06 Q. What is your understanding of the main issues 07 in the lawsuit that you're being deposed about today?</p> <p>08 MR. BOLAND: Object to form.</p> <p>09 A. As I had stated earlier, I had seen an article 10 and it described a break-in to the SuttonPark office 11 related with Noah Davis. But I don't have much other 12 understanding of the issues.</p> <p>13 BY MR. MORLAN, III:</p> <p>14 Q. Are you aware of any evidence that in any way 15 links Paul Kosinski to the allegations against Mr. Davis 16 pertaining to the physical break-in of at SuttonPark's 17 office that you just referenced?</p> <p>18 MR. BOLAND: Object to form.</p> <p>19 A. I'm going to invoke the fifth.</p> <p>20 BY MR. MORLAN, III:</p> <p>21 Q. Are you aware of any evidence that links Saiph 22 Consulting to the physical break-in at SuttonPark, 23 that's been alleged against Mr. Davis in this action?</p> <p>24 MR. BOLAND: Object to form.</p> <p>25 A. Can you repeat that? I'm sorry.</p>

	Page 70	Page 72
01 BY MR. MORLAN, III:		01 about any of the cyber intrusions alleged against
02 Q. Sure. Are you aware of any evidence that		02 Mr. Davis in this action?
03 links SuttonPark, I'm sorry that links at -- Let me		03 A. No. Again, I heard about the issue or the
04 strike that.		04 break-in through a news article. So, that was the
05 Are you aware of any evidence linking Saiph		05 extent of any knowledge I would have on the matter.
06 Consulting, LLC to the break-in alleged against Noah		06 Q. Okay. And when you say the break-in in the news
07 Davis in this lawsuit?		07 article, is that just -- did that article just refer to
08 MR. BOLAND: Object to form.		08 the -- to a physical break-in or also to a computer or
09 A. I'm going to invoke the fifth.		09 cyber intrusion?
10 BY MR. MORLAN, III:		10 A. I can't recall exactly what the extent the
11 Q. Okay. And to be clear, when I say the break-		11 article particularly, but it could have. I honestly
12 in alleged, I mean, the allegations that Mr. Davis		12 don't recall.
13 unlawfully entered SuttonPark's premises on or about,		13 Q. Okay. But you don't have any knowledge
14 September 5, 2024, just to make that clear, do you		14 regarding any cyber intrusions that may have occurred at
15 understand that? When I say break-in, that's what I'm		15 777 Partners or SuttonPark during May, June, July,
16 referring to?		16 August, or September of last year?
17 A. What was the question there?		17 A. I have no knowledge really of the case itself
18 Q. I just want to make sure that we're on the		18 other than, as I said, from a news article. So, it's
19 same page. You mentioned allegations of a break-in		19 hard to give you more information on that.
20 earlier. I want to make sure that we're talking about		20 Q. Okay. Are you familiar with the MP FIN
21 the same thing.		21 system?
22 So, when you were referring to allegations of		22 A. I'm going to invoke the fifth.
23 a break-in, are you referring to allegations in the		23 Q. Is the MP FIN system something that you used
24 complaint in this action that Noah Davis entered		24 in your day-to-day responsibilities in your role at 777
25 SuttonPark's offices without authorization on September		25 Partners?
	Page 71	Page 73
01 5th, 2024, or near that time?		01 A. I'm going to invoke the fifth.
02 MR. BOLAND: Object to form.		02 Q. Do you know what's the term top off means in
03 A. I was strictly speaking to the news article,		03 the context of an e-mail asking whether or not certain
04 which again, I can't recall the details or which outlet		04 accounts should be topped off in advance of reports to
05 it was from, but that was all I was referring to. I		05 Leadenhall. Does that term ring any bell?
06 don't have any other information.		06 MR. BOLAND: Object to form.
07 BY MR. MORLAN, III:		07 A. I'm going to invoke the fifth.
08 Q. Okay. Are you familiar at all with the		08 BY MR. MORLAN, III:
09 allegations of a computer or cyber intrusion that		09 Q. Do you know what the term top off means in
10 Mr. Davis is alleged to have made with respect to		10 general?
11 SuttonPark Capital and 777 Partners' computer systems?		11 A. Going to invoke the fifth.
12 A. I don't have any information regarding the		12 Q. Do you know what a protective advance is?
13 issue.		13 A. Going to invoke the fifth.
14 Q. Are you aware of any evidence linking		14 Q. During the course of your time at 777
15 Mr. Kosinski and any alleged cyber intrusions -- alleged		15 Partners, have you ever heard anyone else say anything
16 to have been committed by Mr. Davis?		16 negative about Paul Kosinski?
17 A. I don't have any information regarding that.		17 A. I'm going to invoke the fifth.
18 Q. Are you aware of any evidence linking Saiph		18 Q. During your time at 777 Partners, have you
19 Consulting, LLC to any of the cyber intrusions alleged		19 ever said anything negative about Mr. Kosinski?
20 against Mr. Davis in this action?		20 A. Going to invoke the fifth.
21 MR. BOLAND: Object to form.		21 Q. What, if any, information do you have
22 A. Again, I'm unfamiliar with the issue at hand,		22 regarding Mr. Kosinski's departure from his former role
23 so I don't have any information to provide.		23 at SuttonPark Capital?
24 BY MR. MORLAN, III:		24 A. I can't recall specifically.
25 Q. Okay. So, you don't have any information		25 Q. What is your current title for -- at 777

<p>01 Partners?</p> <p>02 A. Going to invoke the fifth.</p> <p>03 Q. Are you presently employed by 777 Partners?</p> <p>04 A. Yes.</p> <p>05 Q. Does 777 Partners have a policy or program</p> <p>06 under which they provide Counsel to their employees or</p> <p>07 former employees related to incidents arising out of</p> <p>08 their job duties?</p> <p>09 MR. BOLAND: Object to form.</p> <p>10 A. I'm invoking the fifth.</p> <p>11 BY MR. MORLAN, III:</p> <p>12 Q. Has 777 Partners paid for your Counsel to</p> <p>13 represent you in this deposition?</p> <p>14 A. I'm invoking the fifth.</p> <p>15 Q. Has 777 Partners paid for Counsel to represent</p> <p>16 you, in connection with any other matter?</p> <p>17 A. I'm invoking the fifth.</p> <p>18 Q. Are you aware of whether or not there is a</p> <p>19 justice department investigation pending as to certain</p> <p>20 activities and allegations against 777 Partners in</p> <p>21 SuttonPark Capital?</p> <p>22 A. Invoking the fifth.</p> <p>23 Q. Do you know whether you're a target of any</p> <p>24 federal investigation that relates in any way to your</p> <p>25 role at 777 Partners?</p>	<p>Page 74</p> <p>01 usability or reliability like that currently?</p> <p>02 A. I'm invoking the fifth.</p> <p>03 Q. Do you use the MP FIN system on a day-to-day</p> <p>04 basis as part of your roles and duties at 777?</p> <p>05 A. I'm invoking the fifth.</p> <p>06 Q. When was the last time you accessed the MP FIN</p> <p>07 system?</p> <p>08 A. I'm invoking the fifth.</p> <p>09 Q. Have you ever been asked to modify any</p> <p>10 information within the MP FIN system?</p> <p>11 A. I'm invoking the fifth.</p> <p>12 THE VIDEOGRAPHER: This is the Videographer.</p> <p>13 Can I go off for a media change?</p> <p>14 MR. MORLAN, III: Sure.</p> <p>15 THE VIDEOGRAPHER: This ends Media 1, we're</p> <p>16 going off record. The time is 11:41 A.M.</p> <p>17 (Thereupon, a short discussion was held off</p> <p>18 record.)</p> <p>19 (Deposition resumed.)</p> <p>20 THE VIDEOGRAPHER: Okay. Standby. This</p> <p>21 begins Media 2. We're back on the record. The</p> <p>22 time is 11:41 A.M.</p> <p>23 BY MR. MORLAN, III:</p> <p>24 Q. Do you know what I mean when I say the MP FIN</p> <p>25 system?</p>
<p>01 A. I'm invoking the fifth.</p> <p>02 Q. Do you know who Karen Gorde is?</p> <p>03 A. Yes.</p> <p>04 Q. Who is Karen Gorde?</p> <p>05 A. Employee of, I believe, SuttonPark.</p> <p>06 Q. And what was Karen Gorde's role at SuttonPark?</p> <p>07 A. She was an accountant.</p> <p>08 Q. Do you have any information or evidence that</p> <p>09 would indicate that Ms. Gorde is not trustworthy?</p> <p>10 MR. BOLAND: Object to form.</p> <p>11 A. I'm going to invoke the fifth.</p> <p>12 BY MR. MORLAN, III:</p> <p>13 Q. Were you asked to make any modifications to</p> <p>14 the MP FIN system relating to the pledging of collateral</p> <p>15 by anyone at 777?</p> <p>16 MR. BOLAND: Object to form.</p> <p>17 A. I'm invoking the fifth.</p> <p>18 BY MR. MORLAN, III:</p> <p>19 Q. Were you ever asked by anyone at 777 or on</p> <p>20 behalf of 777 to assist in any way with the collateral</p> <p>21 audit that Saiph Consulting was performing on behalf of</p> <p>22 Leadenhall?</p> <p>23 A. I'm invoking the fifth.</p> <p>24 Q. Do you know whether there's currently any</p> <p>25 problems with the MP FIN system in terms of its</p>	<p>Page 75</p> <p>01 A. I'm invoking the fifth.</p> <p>02 Q. Do you know whether Noah Davis was ever</p> <p>03 contacted as part of a grand jury investigation into 777</p> <p>04 Partners?</p> <p>05 A. I have no knowledge.</p> <p>06 Q. And for purposes of this deposition, when I</p> <p>07 say 777 Partners or SuttonPark, I'm using those terms</p> <p>08 interchangeably because they're both Plaintiffs in the</p> <p>09 lawsuit. So, I just want to make sure that that that's</p> <p>10 clear.</p> <p>11 And, if I say one or the other, and it would</p> <p>12 change your answer to the question if it was only, you</p> <p>13 know, specifically as to one or the other, would you let</p> <p>14 me know?</p> <p>15 A. Okay.</p> <p>16 Q. And insofar as I've -- the questions I've</p> <p>17 previously asked you, would it matter -- would it change</p> <p>18 your answers, if I was talking about only one or the</p> <p>19 other?</p> <p>20 MR. BOLAND: Object to form.</p> <p>21 A. I'm not sure how to answer that. What do you</p> <p>22 mean, can you repeat that?</p> <p>23 BY MR. MORLAN, III:</p> <p>24 Q. I just mean, do I need to go back and re-ask</p> <p>25 the questions specifically and separately as to</p>

<p style="text-align: right;">Page 78</p> <p>01 SuttonPark Capital versus 777 Partners, in order to be 02 clear?</p> <p>03 Like, is there a material difference, in other 04 words, between those two entities that would affect your 05 answers to the questions that I've asked?</p> <p>06 MR. BOLAND: Objection.</p> <p>07 A. I believe I answered the questions to the best 08 of my ability.</p> <p>09 BY MR. MORLAN, III:</p> <p>10 Q. Okay. And would your answers be different, if 11 there was a distinction made between 777 Partners and 12 SuttonPark Capital, LLC?</p> <p>13 MR. BOLAND: Object to form.</p> <p>14 A. I'm not sure how to answer that. I don't 15 think I understand the question.</p> <p>16 BY MR. MORLAN, III:</p> <p>17 Q. Well, the reason I'm asking is that, both 777 18 Partners and SuttonPark are Plaintiffs in this 19 particular lawsuit. And I'm trying to streamline my 20 questions here given that you've already answered some 21 and that for purposes of this lawsuit, the -- both are 22 Plaintiffs, both are making the same allegations and I 23 just wanted to make sure that in treating both of them 24 essentially as alter egos, I'm not missing something or, 25 you know, creating any uncertainty in the way that I'm</p>	<p style="text-align: right;">Page 80</p> <p>01 Q. Correct. Who did you understand your employer 02 to be when you first became involved, when you said you 03 started your position with 777 Partners seven years ago?</p> <p>04 A. 777.</p> <p>05 Q. Okay. And did you consider 777 to be your 06 employer since you started to the present or did it, at 07 some point, change to SuttonPark Capital?</p> <p>08 A. Are you saying, did it change from 777 to 09 SuttonPark Capital?</p> <p>10 Q. Correct.</p> <p>11 A. No. I was hired as a part time job for 12 SuttonPark and transferred to 777 at some point.</p> <p>13 Q. Approximately when did you transfer to 777?</p> <p>14 A. I believe when I started the seven-year tenure 15 with 777 back in 2018.</p> <p>16 Q. When was the last time you spoke with Noah 17 Davis?</p> <p>18 A. I honestly can't recall in passing, in the 19 office at some point.</p> <p>20 Q. Was this current lawsuit brought for purposes, 21 at least in part of retaliating against Saiph Consulting 22 for his role in the collateral audit?</p> <p>23 MR. BOLAND: Object to form.</p> <p>24 A. I'm invoking the fifth.</p> <p>25 BY MR. MORLAN, III:</p>
<p style="text-align: right;">Page 79</p> <p>01 asking you the questions. Does that make sense?</p> <p>02 MR. BOLAND: Object to form.</p> <p>03 A. I believe so. Again, I think I answered the 04 questions to the best of my ability so far.</p> <p>05 BY MR. MORLAN, III:</p> <p>06 Q. Okay. And when you say to the best of your 07 ability, what I'm saying is do I need to re-ask the 08 questions to specifically isolate 777 Partners and 09 SuttonPark Capital, because that would change your 10 answers, or would your answers be the same regardless of 11 whether I'm talking about only one or the other or both?</p> <p>12 MR. BOLAND: Object to form.</p> <p>13 A. You've asked me a lot of questions. It would 14 probably depend on the question, and I -- honestly, I 15 think that I answered them correctly, so.</p> <p>16 BY MR. MORLAN, III:</p> <p>17 Q. Okay. Have you ever worked directly for 18 SuttonPark Capital, LLC?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Have you ever worked directly for 777 21 Partners, LLC?</p> <p>22 A. Yes.</p> <p>23 Q. Have you worked for both of them at the same 24 time?</p> <p>25 A. How do you mean, having two jobs?</p>	<p style="text-align: right;">Page 81</p> <p>01 Q. And do you know whether this lawsuit was 02 brought for purposes of retaliating against Mr. Kosinski 03 for his role in the collateral audit?</p> <p>04 MR. BOLAND: Object to form.</p> <p>05 A. I'm invoking the fifth.</p> <p>06 BY MR. MORLAN, III:</p> <p>07 Q. And do you know whether this lawsuit was 08 brought for the purposes of disincentivizing other 09 financial professionals from performing work on behalf 10 of other creditors to 777 Partners or SuttonPark 11 Capital?</p> <p>12 MR. BOLAND: Object to form.</p> <p>13 A. I'm invoking the fifth.</p> <p>14 BY MR. MORLAN, III:</p> <p>15 Q. And are you aware that there are allegations 16 in the complaint that Noah Davis modified information in 17 the MP FIN system?</p> <p>18 MR. BOLAND: Object to form.</p> <p>19 A. I'm invoking the fifth.</p> <p>20 BY MR. MORLAN, III:</p> <p>21 Q. And are the allegations in the complaint with 22 respect to modifications of the MP FIN system intended 23 to provide cover for other modifications of the MP FIN 24 system, that were made in order to conceal the double 25 pledging of collateral?</p>

Page 82	Page 84
<p>01 MR. BOLAND: Object to form.</p> <p>02 A. I'm invoking the fifth.</p> <p>03 BY MR. MORLAN, III:</p> <p>04 Q. Are you aware of any modifications to the MP FIN system that were made in order to conceal information from 777 or SuttonPark Capital's creditors?</p> <p>05 A. I'm invoking the fifth.</p> <p>06 Q. Are you aware that Leadenhall communicated with 777 or its agents to request access to their systems for purposes of performing a collateral audit?</p> <p>07 A. I'm invoking the fifth.</p> <p>08 Q. And are you aware that the first communications with respect to Leadenhall asking 777 for access to its systems in order to perform a collateral audit occurred during or about July of 2023?</p> <p>09 MR. BOLAND: Object to form.</p> <p>10 A. I'm invoking the fifth.</p> <p>11 BY MR. MORLAN, III:</p> <p>12 Q. And are you aware that 777 Partners did not permit access to its systems for purposes of the collateral audit until some time in May of 2024?</p> <p>13 MR. BOLAND: Object to form.</p> <p>14 A. I'm going to invoke the fifth.</p> <p>15 BY MR. MORLAN, III:</p> <p>16 Q. So, for purposes of my next question, I'm</p>	<p>01 BY MR. MORLAN, III:</p> <p>02 Q. In our allegations related to problems with the integrity, usability, and reliability of the MP FIN system in this lawsuit, intended to provide cover or modifications made to the MP FIN system in order to conceal wrongful conduct by 777 Partners?</p> <p>03 A. I'm invoking the fifth.</p> <p>04 Q. Would your answer be different if I ask the same question, but with respect to SuttonPark Capital, LLC?</p> <p>05 A. I'm invoking the fifth.</p> <p>06 Q. Do you know whether anyone at 777 or SuttonPark encourage Mr. Davis to physically enter SuttonPark's offices in September of 2024?</p> <p>07 MR. BOLAND: Object to form.</p> <p>08 A. Sorry. What was the question?</p> <p>09 BY MR. MORLAN, III:</p> <p>10 Q. Do you know whether anyone affiliated with 777 Partners and/or SuttonPark Capital encouraged Mr. Davis to physically enter the premises of SuttonPark's offices in early September of 2024?</p> <p>11 MR. BOLAND: Object to form.</p> <p>12 A. No, I don't have any knowledge.</p> <p>13 BY MR. MORLAN, III:</p> <p>14 Q. Do you know whether Paul Kosinski or Saiph</p>
<p>01 going to refer to the time period between July of 2023 and May of 2024, when access was ultimately granted to Leadenhall's agents for the collateral as the delay period.</p> <p>02 Is that sufficiently clear just for purposes of my question?</p> <p>03 A. Yes.</p> <p>04 Q. Okay. So, was one of the purposes of the delay period to stall the collateral audit in order to conceal evidence of the double pledging of collateral?</p> <p>05 MR. BOLAND: Object to form.</p> <p>06 A. I'm invoking the fifth.</p> <p>07 BY MR. MORLAN, III:</p> <p>08 Q. And was the purpose of the delay period to allow time to conceal evidence of potential wrongdoing by 777 Partners?</p> <p>09 MR. BOLAND: Object to form.</p> <p>10 A. I'm invoking the fifth.</p> <p>11 BY MR. MORLAN, III:</p> <p>12 Q. Was the purpose of the delay period to make certain changes within the MP FIN system in an effort to conceal evidence of wrongdoing by 777 Partners or SuttonPark Capital?</p> <p>13 MR. BOLAND: Object to form.</p> <p>14 A. I'm invoking the fifth.</p>	<p>01 Consulting encouraged Mr. Davis to physically enter SuttonPark's offices on or about September of 2024?</p> <p>02 A. Again, I heard about this through a news article, so I really don't have any information regarding the instances surrounding.</p> <p>03 Q. Okay. And to be clear, you don't -- your testimony is that you don't have any information regarding any alleged computer intrusions that are related to the matter, that we're here on today.</p> <p>04 Correct?</p> <p>05 MR. BOLAND: Object to form.</p> <p>06 A. The only information that I have is as I stated previously.</p> <p>07 BY MR. MORLAN, III:</p> <p>08 Q. And that would be from the news article?</p> <p>09 A. Correct.</p> <p>10 Q. Who do you currently report to at the 777 Partners?</p> <p>11 A. I'm going to invoke the fifth.</p> <p>12 Q. What role is B. Riley currently playing at 777 Partners?</p> <p>13 MR. BOLAND: Object to form.</p> <p>14 A. I'm going to invoke the fifth.</p> <p>15 BY MR. MORLAN, III:</p> <p>16 Q. Do you know who Mark Shapiro is?</p>
	Page 85

	Page 86		Page 88
01	A. Yes.	01	A. I'm invoking the fifth.
02	Q. Have you ever spoken with Mark Shapiro about	02	MR. MORLAN, III: All right. I'm going to
03	this case?	03	take a quick break for about five minutes to go
04	A. No.	04	through my notes.
05	Q. Did you say, no?	05	THE WITNESS: Okay.
06	A. No.	06	THE COURT REPORTER: I think he froze. We're
07	Q. Have you ever discussed with Mark Shapiro,	07	going off the record. The time is 12:03 P.M.
08	your role in providing reports to Leadenhall?	08	MR. MORLAN, III: I think we froze there for a
09	A. Going to invoke the fifth.	09	second. I don't know if you guys heard my
10	Q. Has Mark Shapiro ever directed you to do	10	question. I said I want to just take a five-
11	anything with respect to your role with 777 Partners?	11	minute break, review my notes, and then, we'll --
12	MR. BOLAND: Object to form.	12	I'll either have relatively little or I may be
13	A. I'm going to invoke the fifth.	13	finished. Does anybody else have anything? Jim?
14	BY MR. MORLAN, III:	14	MR. BOLAND: Not at the moment, no.
15	Q. Has Mark Shapiro ever asked you about any	15	MR. MORLAN, III: Okay. All right. Let's go
16	actions that you've taken as an employee of 777	16	off the record and, hopefully, wrap this up here in
17	Partners?	17	a minute.
18	MR. BOLAND: Object to form.	18	THE COURT REPORTER: We're off the record.
19	A. I'm going to invoke the fifth.	19	(Thereupon, a short discussion was held off
20	BY MR. MORLAN, III:	20	record.)
21	Q. Has anyone from B. Riley ever asked you about	21	(Deposition resumed.)
22	any actions you've taken during your tenure as an	22	THE COURT REPORTER: We are back on the
23	employee of 777 Partners?	23	record. The time is 12:07 P.M.
24	MR. BOLAND: Object to form.	24	BY MR. MORLAN, III:
25	A. Going to invoke the fifth.	25	Q. Do you know whether any documents contained
	Page 87		Page 89
01	BY MR. MORLAN, III:	01	within Steve Pasko's e-mail correspondence, could be
02	Q. Has anyone from B. Riley ever asked you	02	potentially useful to Leadenhall in New York litigation?
03	anything about your role with respect to the preparation	03	MR. BOLAND: Object to form.
04	of compliance reports for Leadenhall?	04	A. I'm invoking the fifth.
05	A. Going to invoke the fifth.	05	BY MR. MORLAN, III:
06	Q. And was one of the purposes of filing this	06	Q. Have you been asked to assist with collecting
07	lawsuit to discourage other 777 employees from	07	any documents for purposes of discovery in this case
08	participating in the grand jury investigation with	08	that we're here on today?
09	respect to 777 Partners?	09	A. I believe it was noted in the complaint, can't
10	MR. BOLAND: Object to form.	10	recall.
11	A. I'm invoking the fifth.	11	MR. MURRAY: I can't answer for you. Got it.
12	BY MR. MORLAN, III:	12	MR. DONOVAN: Yeah.
13	Q. And do you know what I mean when I say the New	13	A. I believe it was noted in the -- in the notice
14	York litigation that's related to this case?	14	to appear here, but I can't recall specifically.
15	A. I'm invoking the fifth.	15	BY MR. MORLAN, III:
16	Q. But you are aware that there was a complaint	16	Q. Well, have you collected any documents to
17	filed by Leadenhall and the Southern District Of New	17	provide to 777 or anyone else in connection with this
18	York against 777 Partners and others. Is that correct?	18	particular lawsuit that we're here on today?
19	A. I'm invoking the fifth.	19	MR. BOLAND: Object to form.
20	Q. Have you discussed the allegations in the New	20	A. I'm going to invoke the fifth.
21	York complaint with anybody other than your Attorney?	21	BY MR. MORLAN, III:
22	A. I'm invoking the fifth.	22	Q. Were you asked to preserve any documents in
23	Q. Have you discussed the allegations of the	23	connection with the litigation that we're here on today?
24	complaint that we're here on with anybody other than	24	A. I'm going to invoke the fifth.
25	your Attorney?	25	Q. Were you instructed to delete any documents

<p style="text-align: right;">Page 90</p> <p>01 related to any of the subject matter that we've 02 discussed in this deposition, including Mr. Donovan's 03 questions?</p> <p>04 MR. BOLAND: Objection.</p> <p>05 A. I'm going to invoke the fifth.</p> <p>06 BY MR. MORLAN, III:</p> <p>07 Q. Are you familiar with the results of the 08 collateral audit that is at issue with this litigation?</p> <p>09 A. I'm going to invoke the fifth.</p> <p>10 Q. Wouldn't the information pertaining to 11 Leaden--</p> <p>12 A. I think you cut off.</p> <p>13 Q. -- to support the results of the audit that 14 was performed, the collateral audit that's at issue in 15 this litigation?</p> <p>16 MR. DONOVAN: Mr. Morlan, your audio just cut 17 out in the middle of that question. So, could you 18 try that question again?</p> <p>19 MR. MORLAN, III: Sure. Is it your 20 understanding --</p> <p>21 THE COURT REPORTER: Oh, he got kicked off.</p> <p>22 MR. BOLAND: And he's gone.</p> <p>23 THE COURT REPORTER: He's back on.</p> <p>24 MR. DONOVAN: All right. So, Mr. Morlan just 25 got kicked out of the Zoom, it looks like and so --</p>	<p style="text-align: right;">Page 92</p> <p>01 Q. And is it your understanding that the 02 information contained within MP FIN as the Leadenhall, 03 along with any other documents that Leadenhall was 04 previously provided by 777, would be sufficient to 05 support the findings of the audit that Saiph performed 06 related to this action?</p> <p>07 A. I'm invoking the fifth.</p> <p>08 Q. Did -- wander -- about any issues with respect 09 to the double pledging of collateral?</p> <p>10 MR. BOLAND: Did it just be that Mr., Morlan's 11 question cut out?</p> <p>12 THE COURT REPORTER: It cut out.</p> <p>13 MR. DONOVAN: Cut out a little.</p> <p>14 MR. BOLAND: Yeah, we got only the last part 15 of it.</p> <p>16 MR. MORLAN, III: Okay.</p> <p>17 BY MR. MORLAN, III:</p> <p>18 Q. Have you spoken with Mr. -- let me start over.</p> <p>19 MR. MORLAN, III: Are you hearing me now? Am 20 I clear or am I breaking up?</p> <p>21 THE COURT REPORTER: You're clear.</p> <p>22 MR. DONOVAN: Yeah.</p> <p>23 BY MR. MORLAN, III:</p> <p>24 Q. Have you spoken with Josh Wander regarding any 25 of the issues with respect to the double pledging of</p>
<p style="text-align: right;">Page 91</p> <p>01 MR. MORLAN, III: I think I'm back now.</p> <p>02 MR. DONOVAN: Oh, you're back now. Okay.</p> <p>03 All right.</p> <p>04 MR. MORLAN, III: That was --</p> <p>05 MR. BOLAND: Last question didn't come in, 06 though.</p> <p>07 MR. MORLAN, III: Okay.</p> <p>08 BY MR. MORLAN, III:</p> <p>09 Q. There's been some allegations in this 10 litigation of a conspiracy to obtain improperly 11 information that might be useful to Leadenhall in the 12 New York litigation.</p> <p>13 Are you familiar with any information that was 14 improperly obtained by Mr. Kosinski during the time of 15 the collateral audit at issue?</p> <p>16 MR. BOLAND: Objection.</p> <p>17 A. I'm going to invoke the fifth.</p> <p>18 BY MR. MORLAN, III:</p> <p>19 Q. And is it your understanding that Leadenhall 20 would be entitled to review the records in MP FIN as 21 would pertain to any collateral that was pledged to 22 Leadenhall?</p> <p>23 MR. BOLAND: Objection.</p> <p>24 A. I'm going to invoke the fifth.</p> <p>25 BY MR. MORLAN, III:</p>	<p style="text-align: right;">Page 93</p> <p>01 collateral?</p> <p>02 MR. BOLAND: Object to form.</p> <p>03 A. I'm invoking the fifth.</p> <p>04 BY MR. MORLAN, III:</p> <p>05 Q. Have you spoke with Mr. Pasko with respect to 06 any allegations regarding the double pledging of 07 collateral pledged to Leadenhall?</p> <p>08 MR. BOLAND: Object to form.</p> <p>09 A. I'm invoking the fifth.</p> <p>10 BY MR. MORLAN, III:</p> <p>11 Q. Have you spoken with Mr. Wander or Mr. Pasko 12 with respect to any of the allegations of the complaint 13 in this action?</p> <p>14 MR. BOLAND: Object to form.</p> <p>15 A. I'm invoking the fifth.</p> <p>16 BY MR. MORLAN, III:</p> <p>17 Q. Have you spoken with either Mr. Pasko or 18 Mr. Wander with respect to the allegations of the New 19 York complaint?</p> <p>20 A. I'm invoking the fifth.</p> <p>21 Q. Have you spoken with Mr. Wander regarding any 22 of the allegations against Paul Kosinski and Saiph 23 Consulting in this matter?</p> <p>24 MR. BOLAND: Object to form.</p> <p>25 A. I'm invoking the fifth.</p>

	Page 94		Page 96
01	BY MR. MORLAN, III:	01	explain read or waive to him or do you just want to
02	Q. Have you ever heard anybody discussing Paul	02	do it for him?
03	Kosinski for any purpose since his departure from	03	MR. DONOVAN: Yeah. You can explain.
04	SuttonPark in late 2020?	04	THE COURT REPORTER: So, if this is ordered,
05	MR. BOLAND: Object to form.	05	the transcript of everything I wrote down, you have
06	A. I'm invoking the fifth.	06	the choice of getting a copy that you can read or
07	BY MR. MORLAN, III:	07	you can waive that right and just assume that I've
08	Q. Have you ever had any discussions with Josh	08	typed everything correctly.
09	Wander regarding anything to do with Saiph Consulting	09	If not, if you do read, I do send you an e-
10	LLC?	10	mail, with the transcript and you get to go over
11	A. I'm invoking the fifth.	11	it. And in the event that there's something that
12	Q. Have you ever had any conversations with Josh	12	was misunderstood or misspoken and there's an
13	Wander regarding Paul Kosinski?	13	error, you would fill out an errata sheet at the
14	A. I'm invoking the fifth.	14	Court reporting office, and you can correct any
15	Q. Have you ever had any conversations with Steve	15	errors on it. Would you like to read or waive?
16	Pasko regarding Paul Kosinski?	16	THE WITNESS: I think we'll read.
17	MR. BOLAND: Object to form.	17	THE COURT REPORTER: Read?
18	A. Invoking the fifth.	18	THE WITNESS: Yeah.
19	BY MR. MORLAN, III:	19	(Deposition concluded at 12:30 P.M.)
20	Q. Have you ever had any conversations with Steve	20	(Reading and signing of the deposition by the
21	Pasko regarding the reasons this lawsuit was brought?	21	witness has been reserved.)
22	MR. BOLAND: Object to form.	22	
23	A. Invoking the fifth.	23	
24	BY MR. MORLAN, III:	24	
25	Q. Have you ever had any discussions with Josh	25	
	Page 95		Page 97
01	Wander regarding the reason this lawsuit was brought?	01	CERTIFICATE OF REPORTER
02	MR. BOLAND: Object to form.	02	STATE OF FLORIDA
03	A. Invoking the fifth.	03	COUNTY OF MIAMI-DADE
04	BY MR. MORLAN, III:	04	
05	Q. Have you ever had any discussions with anyone	05	I, MICHELLE VILLALOBOS, Court Reporter and Notary
06	from B. Riley as to why this lawsuit has been brought?	06	Public for the State of Florida, do hereby certify that
07	A. Invoking the fifth.	07	I was authorized to and did digitally report and
08	Q. Have you ever had any discussions with anybody	08	transcribe the foregoing proceedings, and that the
09	else at 777 Partners regarding why this lawsuit was	09	transcript is a true and complete record of my notes.
10	brought?	10	
11	MR. BOLAND: Object to form.	11	I further certify that I am not a relative,
12	A. Invoking the fifth.	12	employee, attorney or counsel of any of the parties,
13	BY MR. MORLAN, III:	13	nor am I a relative or employee of any of the parties'
14	Q. Have you ever had any discussions with anyone	14	attorneys or counsel connected with the action, nor am
15	from 777 Partners or SuttonPark Capital regarding the	15	I financially interested in the action.
16	damages alleged in this lawsuit?	16	
17	MR. BOLAND: Object to form.	17	Witness my hand this 26th day of March, 2025.
18	A. I'm invoking the fifth.	18	
19	MR. MORLAN, III: I have nothing further.	19	
20	MR. BOLAND: I have no question.	20	
21	MR. DONOVAN: Nothing further from me.	21	MICHELLE VILLALOBOS, COURT REPORTER
22	THE VIDEOGRAPHER: This concludes today's	22	NOTARY PUBLIC, STATE OF FLORIDA
23	deposition. We're going off the record. The time	23	
24	is 12:18 P.M.	24	
25	THE COURT REPORTER: All right. Can someone	25	

<p style="text-align: center;">Page 98</p> <p>01 CERTIFICATE OF OATH 02 STATE OF FLORIDA 03 COUNTY OF MIAMI-DADE 04 05 I, MICHELLE VILLALOBOS, the undersigned 06 authority, certify that ALEXANDER ADNANI, personally 07 appeared before me and was duly sworn on the 24th day 08 of March, 2025. 09 Witness my hand this 26th day of March, 2025.</p> <p>10</p> <p>11  12 13</p> <hr/> <p>14 MICHELLE VILLALOBOS, COURT REPORTER NOTARY PUBLIC, STATE OF FLORIDA 15 Commission No.: HH 373556 Commission Exp: MARCH 15, 2027 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: center;">Page 100</p> <p>1 Errata Sheet 2 3 NAME OF CASE: 777 Partners LLC & Suttonpark Capital vs Leadenhall Capital 4 DATE OF DEPOSITION: 03/24/2025 5 NAME OF WITNESS: Alexander Adnani 6 Reason Codes: 7 1. To clarify the record. 8 2. To conform to the facts. 9 3. To correct transcription errors. 10 Page ____ Line ____ Reason ____ 11 From _____ to _____ 12 Page ____ Line ____ Reason ____ 13 From _____ to _____ 14 Page ____ Line ____ Reason ____ 15 From _____ to _____ 16 Page ____ Line ____ Reason ____ 17 From _____ to _____ 18 Page ____ Line ____ Reason ____ 19 From _____ to _____ 20 Page ____ Line ____ Reason ____ 21 From _____ to _____ 22 Page ____ Line ____ Reason ____ 23 From _____ to _____ 24 25 _____</p>
<p style="text-align: center;">Page 99</p> <p>01 DATE: 03/26/2025 TO: ALEXANDER ADNANI 02 C/O Francis D. Murray, Esquire Stumphauzer Kolaya Nadler & Sloman, PLLC 03 2 SOUTH BISCAYNE BOULEVARD SUITE 1600 MIAMI, FLORIDA 33131-1824 04 IN RE: 777 Partners LLC & Suttonpark Capital v. Leadenhall Capital 06 CASE NO: 24-81143-CIV-DMM 07 Dear Mr. Adnani, 08 Please take notice that on 03/24/2025, you gave your deposition in the above-referenced matter. At 09 that time, you did not waive signature. It is now necessary that you sign your deposition. You may do so 10 by contacting your own attorney or the attorney who took your deposition and make an appointment to do so 11 at their office. You may also contact our office at the below number, Monday - 12 Friday, 9:00 AM - 5:00 PM, for further information and assistance. 13 If you do not read and sign your deposition within 14 thirty (30) days, the original, which has already been forwarded to the ordering attorney, may be filed with 15 the Clerk of the Court. 16 If you wish to waive your signature, sign your name in the blank at the bottom of this letter and promptly return it to us. 17 Very truly yours, 18 Michelle Villalobos, Court Reporter Universal Court Reporting (954)712-2600 21 I do hereby waive my signature. 22 23 _____ 24 Alexander Adnani Cc: via transcript: Brian Donovan, Esquire Francis Murray, Esquire 25</p>	





















































